

# A response to WelFur publication by Fur Free Alliance

This document is a response to the report ‘Why WelFur fails to stop the suffering of animals on fur farms’ issued by Fur Free Alliance in January 2020. Fur Free Alliance (FFA) is an international coalition of animal lobby organisations, predominantly advocating vegan values. The report offers no new perspectives to the debate over fur farming, but rather echoes previous campaigns from FFA or its membership.

Fur Free Alliance’s report sets out to discredit the animal welfare assessment programme WelFur, which on their website is described as “the fur industry’s cynical PR tool”. In spite of the undeniable purpose of Fur Free Alliance they fail to document this headline – the scientific validity of WelFur remains undisputed throughout the entire report.

It follows that Fur Free Alliance *recognises* the following central points about WelFur:

- WelFur is developed by independent animal welfare experts from seven European universities.
- WelFur works on the same principles and methodology as the European Commission’s Welfare Quality® project.
- The quality of the scientific work and the alignment with the original Welfare Quality® project has been secured by respected external animal welfare experts<sup>1</sup>.
- WelFur has been endorsed in the European Commission’s Database for Self-regulation Initiatives<sup>2</sup> as the first animal welfare programme in history. This requires testing against the principles Openness, Good Faith, Monitoring, Continuous improvement, Inclusiveness and Legal compliance, all of which are key elements in robust legislation.
- Baltic Control is a professional, independent third-party assessor of animal welfare.

## What is the scientific consensus on fur farming?

The existing housing systems for fur farmed species Europe provides good animal welfare, and allow animals to exercise behaviours they are strongly motivated for. The scientific documentation for this is comprehensive<sup>3</sup>.

Fur farmed species are characterised by short generation intervals, and the relative short domestication period means the animals have adapted to the farm environment without the welfare problems other domesticated species have

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<sup>1</sup> Prof. Harry Blokhuis, Swedish University of Agricultural Science, Uppsala, Sweden; Prof. Georgia Mason, University of Guelph, Canada; Prof. Emeritus David Morton, University of Birmingham, UK.

<sup>2</sup> <https://www.eesc.europa.eu/en/policies/policy-areas/enterprise/database-self-and-co-regulation-initiatives/146>

<sup>3</sup> For example: Koistinen, T., Korhonen, H.T., Hämäläinen, E., Mononen, J. (2016) Blue foxes’ (*Vulpes lagopus*) motivation to gain access and interact with various resources. *Applied Animal Behaviour Science*, 176: 105-111.; Jordbruksverket, Swedish Board of Agriculture (2018): ‘*Utvärdering av välfärden hos växande minkar hållna i grupp och parvis i etageburar*’. Aarhus University (2010): ‘*Velfærd hos mink*’.

developed through long domestication processes. The shorter domestication process also explains why the annual life cycle on fur farms corresponds well – and significantly better than other livestock - with the life cycle of the animals' wild counterparts.

We accept there is an element of value judgment in people's account of animal welfare, but FFA seeks to establish a premise of animal welfare only being possible in housing systems mimicking nature 100 percent. This is unscientific and does a disservice to the animals. Domestication is exactly about adapting to a new environment.

Over the past two decades the species-specific needs of fur farmed species have been the focal point of numerous studies in which fur animals' motivation for various enrichment objects have been examined. Each of these studies have been included in the comprehensive scientific review of all existing literature reviewed which formed the basis of scoring, and decisions about measurement in the WelFur protocols. While mink and foxes respectively are willing to work to gain access to swimming water and digging opportunities, they are more motivated to gain access to other enrichment objects (shelves, tubes), albeit these appear less 'natural'.

Contrary to FFA's perception this is indeed reflected in the WelFur protocols. Both mink and fox are rewarded in WelFur's scoring system if they have access to swimming water or sand to dig in respectively. However, other enrichment objects are rewarded with a better score, simply because other enrichment objects offer better welfare to the animals. This knowledge is derived from choice tests of the kind FFA demands, and reflect the animals' own motivations.

What FFA offers is speculation in a scenario of farmed fur animals missing something they have never experienced. This is possible in theory, but contradicted in the literature. For example, not all mink enter water when this resource is available, which they would be expected to if swimming was an innate need<sup>1</sup>. Likewise, research has established that absence of swimming water, without prior experience, does not lead to consistent changes in the level of stereotypic behaviour<sup>2</sup>.

FFA further speculates that stereotypic behaviours in farmed fur animals are the direct result of 'intensive cage systems', again leaving readers with the impression that the housing system and its lack of resemblance with nature (size, swimming water/digging opportunities) causes inherent animal welfare problems. Numerous scientific studies have demonstrated that environmental complexity is the key to good animal welfare for farmed fur animals including reduced occurrence of stereotypic behaviours, while the size of the cage is important only in order to allow for this environmental complexity<sup>3</sup>. As demonstrated before, swimming water and digging opportunities are enrichment objects that can add to environmental complexity, but other enrichment objects offer better animal welfare.

It is likewise a relevant perspective that stereotypic behaviours occur in a wide range of animals, from pets to production animals, and across housing systems. The occurrence on fur farms however, is at a low level of 1.1 and 0.6 percent for

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<sup>1</sup> Aarhus University (2010): 'Velfærd hos mink'.

<sup>2</sup> Vinke et al (2008), 'To swim or not to swim: An interpretation of farmed mink's motivation for a water bath' Appl. Animal Behaviour Science 111, 1–27

<sup>3</sup> For example Hansen et al. (2007), "Do double cages and access to occupational materials improve the welfare of farmed mink?"

mink and fox respectively<sup>1</sup>. Importantly, there are clear variances of stereotypic behaviours between individual farms, which suggests it is possible to reduce, if not eradicate, the occurrence of stereotypic behaviour going forward<sup>2</sup>.

### WelFur: A tool for improvement of animal welfare

WelFur's major potential to improve animal welfare on fur farms is completely left out of FFA's report. This might be associated with the misunderstanding FFA makes in stating that WelFur "rewards status quo" (the existing housing system). In reality WelFur evaluates animal welfare based on scientifically validated methods regardless of the housing system. This also marks the principal difference between audits and assessments, which FFA likewise is confused about. Hence, it is incorrect when FFA states that WelFur requires "lower standards than in some EU countries". WelFur is not based on legal standards, but science, and good animal welfare is rewarded.

The wrongful "status quo" premise is further degraded by the fact that WelFur protocols are dynamic, which mean protocols are subject to regular updates considering new research and adjustment of the scoring system. Effectively WelFur continues to challenge the status quo rather than maintaining it. In the future this might also include development of indicators based on qualitative behavioural assessments.

WelFur excels as a tool for analysis of potential welfare issues on the individual farm. Fur Europe has a national WelFur advisor system in place with the purpose to undertake in-depth analysis of the WelFur data. Clearly the purpose of this is not to "allow serious welfare problems to be masked", but we recognise the principal criticism. However, masking and compensation is a matter to be handled in all welfare assessment systems. WelFur has dealt with this exactly as in Welfare Quality, just as WelFur and Welfare Quality do not claim to be something else than on-farm animal welfare assessment.

Yet, animal welfare on European fur farms will certainly improve because WelFur works as a tool for methodological analysis of animal welfare. The methodological approach to animal welfare improvement is directly supported by the national advisory system. If animal welfare improvements indeed is the purpose of Fur Free Alliance, it seems counterproductive to argue against a science-based programme so well equipped for systematic animal welfare improvement.

Another argument FFA brings forward blindfolded is that 20 years' animal welfare research has not been adopted by the fur sector. This appears somewhat comical when brought forward in a report about WelFur, since the WelFur protocols is a manifestation of *all* research available. The implementation of scientific research is of course also documented in various national legislations since 2001.

The blind angle seems to appear solely because Fur Free Alliance refuses to accept that the scientific literature is quite straightforward in saying that good animal welfare – to the extent animal welfare can be measured and weighed objectively - is entirely possible in the existing housing systems.

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<sup>1</sup> WelFur data 2020.

<sup>2</sup> FFA suggests the methodology to measure stereotypic behaviour may be unreliable. This must be attributed to speculation as well: WelFur, including the measurements and design of these, are developed by independent universities, and the scientific quality has been secured by external scientific experts.

## The 2001 SCAHAW report

Large parts of FFA's argument is tied directly to the 2001 report on the welfare of animals kept for fur production by the Scientific Committee on Animal Health and Animal Welfare (SCAHAW). The sentence "*Current husbandry systems cause serious problems for all species of animals reared for fur*" is highlighted again and again throughout FFA's report.

It is conveniently left out of Fur Free Alliance's argument that 8 animal welfare experts, all original contributors to the report, put their foot down and publicly denounced the conclusions of the report, which they had been kept from commenting on while in the making:

*First, it seems to have become politically slanted against fur farming, especially mink farming. Second, large numbers of references have been removed. Third, it contains several errors of fact or interpretation, some of which are potentially important for animal welfare, and others of which are so ridiculous that they compromise the report's credibility (see Annex).*

Is there anything to be mistaken about? The European Commission unconditionally accepted the complaint and the SCAHAW report was re-issued with a 14 page erratum. Needless to say, the SCAHAW report cannot be interpreted without this critical context, which eliminates the foundation of Fur Free Alliance's argument against the existing housing system.

## Documentation of animal welfare

We may disappoint Fur Free Alliance in saying that undercover 'investigations' by their national membership does not qualify as documentation of generally poor animal welfare in the European fur production.

Obviously, 'documentation' obtained and edited by animal lobbyists with the declared goal to ban fur farming is biased. In extension, the FFA report promotes an 'expert veterinary opinion' concluding that conditions on fur farms violates 'Directive 98/58/EC Concerning the Protection of Animals Kept for Farming Purposes', a position based solely on cherry-picked footage. The 'expert' veterinarian has never been on a fur farm in his entire life<sup>1</sup>.

A similar bias was found in the last WelFur publication signed by Fur Free Alliance. The report '*The case against fur factory farming – a scientific review of animal welfare standards and WelFur*' was authored by Professor Stephen Harris, Bristol University, who used to compare fur farming with Nazi concentration camps<sup>2</sup>. Mr. Harris has twice been thrown out as expert witness from British courts due to his personal links with animal lobby groups<sup>3</sup>, and following these scandals he is no longer employed at Bristol University. Similar to the current report, Mr. Harris' job was to provide an academic front opposing WelFur, in spite of never having been involved in actual research on fur farmed species. Just like in the current report, Mr. Harris failed to do so<sup>4</sup>.

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<sup>1</sup> Mr. Alistair MacMillan, who works for Brussels-based animal lobby organisation Humane Society International, gave Fur Europe this information on 21 January 2020.

<sup>2</sup> The Telegraph, 1 August 1998

<sup>3</sup> <https://www.thetimes.co.uk/article/hunt-case-collapses-over-experts-bias-z2kr5ws2xpt>;  
<https://www.telegraph.co.uk/news/2019/05/25/expert-dropped-hunting-case-kissing-prosecution-witness/>

<sup>4</sup> The publication eventually admitted: "*It is beyond the scope of this report to give a detailed critique of the WelFur protocols*".

The objective evaluation of animal welfare in the European fur sector must of course lie with animal welfare experts with hands-on experience, independent welfare assessments such as WelFur<sup>1</sup>, or other objective sources. When this happens there is no reason to single out fur farming for having extraordinary welfare problems. In fact, often most fur farmed species fare better than comparable livestock productions<sup>2</sup>.

While FFA addresses pain and suffering as some zero-sum game, society as a whole generally accepts that some injuries and diseases occur in animal productions. No matter what precautions one take, incidences involving pain cannot be completely avoided, just as traffic rules cannot eliminate traffic accidents. The important thing is to make sure unnecessary pain is avoided and prompt treatment is ensured.

Such perspective is never reflected in the material FFA members obtain illegally on animal farms. Individual animals in distress are not representative for the herd, let alone an entire industry, and such undercover footage is not documentation of systematic animal abuse. It is, as anyone can see for herself, first and foremost PR material, and as far as general documentation of animal welfare goes, it is not legitimate without context, as the European Commission has pointed out recently<sup>3</sup>.

### In summary

The most notable about FFA's criticism of WelFur is that it does not attack the scientific validity of WelFur, and its alignment with the original Welfare Quality® project in any way. Seeing as WelFur is developed by independent universities, this is not a surprise, but worth mentioning since FFA is do keen to label WelFur as industry whitewashing. The scientific foundation is also validated in the external expert review of WelFur:

*We commented on scientific reviews that were conducted into potential welfare issues and potential welfare indicators. These were all detailed, scholarly, involved hundreds of person-hours of work, and were of publishable quality. Their analyses of the key issues, and of the validity, reliability and practicality of the various potential welfare indicators available, were very thoughtful and robust. The relative merits of animal based indicators versus resource-based measures were well appreciated (animal-based measures being favoured wherever possible, a decision we support). Overall, these reviews provided a firm scientific foundation for all subsequent decisions<sup>4</sup>.*

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<sup>1</sup> Fur Europe understands that the sub-contracting of Kannus Research Farm Luova Ltd, a company owned 38 percent by Finnish Fur Breeders' Association (FIFUR), may give rise to questions about impartiality. We maintain that Fur Europe's contract is with Baltic Control alone, and only Baltic Control can issue WelFur certificates. The quality of Luova's work is verified by DNV GL in 2019 (a leading global provider of quality assurance and certifying management), and that FIFUR has publicly announced they are in the market for selling their minority share to reliable investors in order to avoid further accusations about impartiality. Other current Luova shareholders are Natural Resources Institute Finland Luke (Finnish state-owned institute), The Central Union of Agricultural Producers and Forest Owners (MTK) and The Federation of Education in Central Ostrobothnia.

<sup>2</sup> WelFur data 2020: mink mortality (1.5%), injuries (1.1%), fox mortality (2.2%), injuries mild (0.65%), infections (0.04%).

<sup>3</sup> Head of DG Sanco's Animal Welfare Unit made this explicit point on the very same footage referred to in the current report, when it was presented by FFA members in the European Parliament 22 November 2019.

<sup>4</sup> The external review undertaken by Prof. Harry Blokhuis, Swedish University of Agricultural Science, Uppsala, Sweden; Prof. Georgia Mason, University of Guelph, Canada; Prof. Emeritus David Morton, University of Birmingham, UK.

Throughout, the report throws suspicion on fur farming in rather improper ways. A legitimate criticism of masking is presented as unique for WelFur, while such limitations are pervasive in animal welfare assessments, and no promises have been made otherwise. In the same way, suspicion is cast over the fact that WelFur is initiated by the industry itself, while it remains unclear exactly why it is problematic for an industry to take responsibility and enforce science-based animal welfare policies.

It is even more problematic that FFA jumps to conclusions about the biological needs of farmed fur animals. This is clearly designed to support the notion that good animal welfare is impossible in the existing housing system. Again, hints are made and suspicions are cast, but no causation and coherent documentation is ever offered. Instead these conclusions must be attributed to a purely value-based interpretation of present animal welfare research on fur farmed species.

In reality the scientific literature rather clearly indicates the opposite view: it is entirely possible to provide farmed fur animals with good animal welfare, interpreted as a positive experience of their own life, in the current housing system.

To the

## Scientific Committee of Animal Health and Animal Welfare,

You adopted the report on “The Welfare of Animals Kept for Fur Production”, Thursday the 13<sup>th</sup> of December, 2001, and on Wednesday the 19<sup>th</sup> of December this adopted report was made public. As members of the Working group, we hereby inform you that the adopted report is unlike the report we made in some crucial and major points. For example, it now contains several errors of fact which are, to be frank, simply embarrassing. We would also like to protest the lack of consultation that has typified the last few months, and the removal of a vast number of references from large sections of the final report. We dedicated much time to this report over the past 1½ years, and are all recognised scientists with experience in fur animal research. Therefore we feel disappointed and dismayed by how the Committee has acted since we submitted our document. .

Since our last meeting in May, there has been no communication or discussion between the members of the Working group and the Sub-committee. Robert Dantzer (head of the Working group, member of the Sub-committee and Scientific Committee) can confirm this silence. Two weeks ago we were informed that this was because of perceived ‘conflicts of interest’ within the Working Group. We find this objectionable on two grounds. First, it is insulting: we are scientists, not politicians; and any suggestion that our scientific views are affected by views of the industry is simply unacceptable. Second, it is procedurally highly unorthodox: if conflicts of interest were perceived to be an issue, they should have been discussed and aired when the Working Party started its work – not invoked in this *ad hoc* manner long after our last meeting.

This lack of consultation has not only been objectionable, it has also compromised the scientific quality of the final report, as we detail below. We take issue with three aspects of the final report. First, it seems to have become politically slanted against fur farming, especially mink farming. Second, large numbers of references have been removed. Third, it contains several errors of fact or interpretation, some of which are potentially important for animal welfare, and others of which are so ridiculous that they compromise the report’s credibility. Our draft of the report was based solely on scientific knowledge and scientific judgements, and we find these aspects of the final report surprising and disappointing, especially given how easily they could have been avoided.

The chapter on mink welfare, and its conclusions, have been changed dramatically, with a consistent elimination of positive welfare aspects of mink farming, and additions of text unknown to the Working Group (all negative towards mink farming, and with no references). As an example, the Working Group document (W) concluded that “The welfare of farmed mink is reasonably good”. This conclusion is missing in the adopted version of the report (R). While we (W) concluded that lack of swimming water for mink was a *possible* welfare problem, because the research so far is not completely conclusive, in your report, the conclusion is: “An adequate fur-farming system for provision of swimming water has to be designed.”, implying that it is definitely important. Another example: The conclusion of our working document “Young mink are weaned after nutritional independence, in contrast to many other agricultural animals” is missing in R. R also concludes: “Weaning before nine weeks leads to a variety of welfare problems”, with no supporting data, in contrast to the Working group conclusion: “Mink should not be weaned before 8 weeks of age..” based on solid data. This last is particularly important, as it is used to recommend not weaning before nine weeks (p. 184, R) - yet leaving a large litter together in a standard cage until this age is potentially dangerous, as we make clear in our report (W). Several other points are listed below.

The chapter on mink welfare (Chapter 9) has also lost most of its references. This gives the report a highly amateur, unsubstantiated feel, and also means that readers can no longer distinguish between work published in refereed journals and that published in internal reports etc. We can see no excuse for this. All the references supporting this chapter (around 200) were supplied to the EC in May, giving the Committee over six months to incorporate them. They were provided in alphabetical order, and were divided into refereed and un-refereed articles, as requested. If they could not after all have been typed in by staff at Brussels, they could have been returned to us for typing. There was ample time for this. Instead, we simply heard nothing, and none of these references have been used.

Finally, we are concerned at the factual errors which have now slipped into the report. For example, nursing sickness is **not** a problem for mink (cf.p. 116, R) – for example, it has not been seen in Denmark for over six years. There are **no** strains of mink which suffer from ‘blindness’ (cf. P. 117) – this is a complete fiction. Mink farming has **not** been banned in the Netherlands (cf. p. 47). Group-housing **has** been adopted commercially (cf. unsubstantiated claim on R, p. 117). Again, several other points have been listed below.

Overall, we feel that the Committee has chosen to focus only on a few examples showing welfare problems (for example studies from the 1980s expressing a high degree of stereotypy in mink), and that Committee has chosen to downplay the vast amount of studies showing positive aspects of welfare. Below are some of the further points where we find the changes and added text un-acceptable. There are several welfare problems in fur animals like in most confined animals, but most of these can be reduced by the present scientific knowledge. The reduction or elimination of the remaining welfare problems must be based on further research, not on anecdotal evidence.

**We sincerely hope that you will consider withdrawing the report and asking the Subcommittee to do a more objective job based on the scientific evidence provided in the final draft from the last meeting of the Working Group. We are willing to help with this process. If you choose to keep the adoption of the report as now stands, the following authors of this letter withdraw from the Working Group and request that our names are deleted from the list of the Working Group members.**

### 03.01.02

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### Comparisons of the working group document W and the adopted version R.

- In R, chapter 2 you state that “*this report contains only scientific assessments and scientifically based conclusions on how their welfare can be improved*” but you fail to fulfil this statement. Below the evidence for this failure is further documented
- In R, chapter 6.3 conclusions and in conclusion, chapter 17, no. 11: You have removed “blue foxes” in your sentence: “Selection for reduced fearfulness towards humans is successful and results in positive welfare effects in the species studied : silver fox and mink”. To support yourself, you have removed a whole chapter with scientific evidence that selection for reduced fearfulness is successful in blue foxes too, namely chapter: 10.14 page 159-162 in W. And actually you conclude in 15.6 that selection against fearfulness is effective in foxes, chapter 15.6.
- In R, page 42, chapter 6.2.2 you state that “the farm breed blue fox .... is less domesticated than the blue fox”, which is very different from the sentence in W, page 41, lines 27-29: “The farm breed blue fox is not domesticated *sensu stricto*, although it is claimed to be adapted to captivity.”
- In R, page 47, chapter 7, you state that fur farming is banned in the Netherlands. This is not true. Only Great Britain banned fur farming as the W correctly mentions.
- On the same page you have deleted 4 sentences in R, expressing in W that enclosures to foxes gave rise to hygienic and parasite problems in the 40’ies (with a reference)
- On page 86, in R, you have changed a sentence into something much broader: You have deleted the word “food” in front of deprivation (in W, page 94, line 25)
- In R, page 86, second paragraph on abnormal behaviours II self chewing, you have added a new paragraph. It is unknown text to us and not documented with references (no data).
- On the same page you have changed a past tense to present, again making another meaning of the statement. We refer to an old survey of mink fur-chewing from 1984 stating that these kind of problems existed on every farm in those days (W, page 94, line 34). You changed it to “exist on every farm” (R, page 86), which there is no data to support.
- In W, chapter 9.2, page 99: This later report concluded that compared to the pig and poultry industries the fur industries practices are relatively benign. We agree with that view here, but also emphasise.....” This paragraph is deleted in R, page 89.
- In W, sentence 18-20, page 99 chapter 9.2.1 “Pregnant mink are generally quiet and well-fed and prenatal stress which can have long term effects on the offspring’s HPA function is unlikely to be a major issue for mink” This has been removed in R, page 89.
- In R, page 90, you have added 4 sentences from a study and you have deleted a sentence from W page 99, line 34: “ ....though in normal practice it is unlikely to represent a major welfare issue for the typical farmed mink”



- In R, page 90, chapter 9.2.2 you have deleted the words “and during nursing” ignoring the results of the referred study (W, page 99, line 42)
- In R, page 92, you have deleted a paragraph in W, page 102, chapter 9.2.2 “...only some appears directly attributable to poor husbandry or welfare”
- In R, page 92, you have deleted a sentence in W, page 102, line 25/26 “ ...suggest that infancy is a time of high welfare for mink”
- In R, page 93, you have removed:” In conclusion, however, the welfare of growing infant mink seems to be good; morbidity and mortality are low, with good farm management and levels of playing and social interactions are high (W, page 103, line 28-30)”
- In R, page 94, you have removed a whole paragraph “...we recommend that weaning never occurs earlier than 8 weeks and preferably later.....” (W, page 105, line 24 and on)  
To complete this you conclude that weaning should not take place earlier than 9 weeks of age, despite our conclusions that it should not take place prior to 8 weeks of age (which is supported by data)
- In R, page 99, welfare of family housed kits, you have added a lot of new text, praising group/family housing despite the data documenting welfare problems with this system. You have also chosen to erase all reference by Danish researcher (published in AABS, ACTA) on mink and group/family housing, despite the fact that you continuously refer to de Jonge (published in Dutch in national magazines or un-published). The scientific references are in W in that chapter. Why chose to eliminate them? You also refer wrongly to de Jonge on results from the Danish studies (scientifically published) several times on page 100-101.
- In R, page 103 you have deleted a sentence from W (page 113) “ Adult mink is generally healthy.....”
- In R, page 111, you have removed a sentence from W, page 121:”female stereotypy is low during pregnancy.”
- In R, page 109, reference from Hansen and Jeppesen, 199, 2000, 2001 is deleted from the text, though they are referred to (published in scientific journals) (W, page 118).
- In R, page 113, 114, 115, Scientific publications from Danish research team are again ignored, though in W, page 121-123.
- in W (9.2.12, 1) and (16,30) it is stated that  
“The welfare of mink is reasonably good, at least compared with other intensively farmed animals”. This statement is deleted in R, page 116, 9.2.12
- W (9.2.12,4) and (16,33) states that “Mink shows little fear of humans, and despite being naturally solitary, largely seems to adapt well to the enforced proximity of conspecifics.” This statement is deleted in R, page 116, 9.2.12. On the contrary it is suggested/concluded in several places (e.g.17,39) that "inability to avoid social contact" is a problem, which impairs mink welfare.
- W (9.2.12,3) and (16,32) states that  
“Breeding of farmed mink is generally unproblematic”.  
This statement is deleted in R, which reads instead (R page 116): “The mortality of mink kits during nursing period has been reported to be up to 30% with a mean of 20%. - - - Lactation is a period of high risk especially because of nursing disease”. Nursing sickness is no longer a major problem, as we detail in W; for example, it has not been reported in Denmark for the last six or seven years.
- W (9.2.12,5) and (16,34) is changed:  
“Locomotor stereotypies can occur in farmed mink. However, their prevalence can often be reduced by simple measures such as high levels of feeding” to R (page 116): Stereotypies, largely locomotor in nature, are widespread on mink farms. - - “
- Similarly, R now concludes, on the basis on negligible data, that gastric ulcers are widespread in farmed mink (p. 116).
- W (9.2.12,6) and (16,35) is missing:  
“Young mink are weaned after nutritional independence, in contrast to many other agricultural animals”. Instead: R (page 116): Weaning before nine weeks leads to a variety of welfare problems.
- W (9.2.12,8+9) and (16,38+40) talk about possible welfare problems and aspects that can impair welfare: "- Several aspects of husbandry can impair mink welfare. - - Possible welfare problems include.."  
R generally omit the reservations (possible and can) and mentions problems as if they were well documented facts, e.g. (17,39): "The typical mink cage - - impairs mink welfare - . Particular problems are -."

- R (page 116) mentions self-mutilation of tail or limb tissue as widespread. This was not part of W and is not supported by scientific evidence.
  - When it comes to group housing and swimming water the presentation in R is apparently extremely twisted. W gives a warning against group housing (9.2.12,10 " The welfare consequences - are not yet fully assessed") and mentions "lack of water to swim in" as a possible welfare problem (9.2.12,9). R (page 116 "None of these systems has yet been adopted commercially") leads to the impression that it is regrettable that group housing is not yet introduced in practice, and R simply claims that: "Adequate fur-farming system for provision of swimming water has yet to be designed" on page 116, but on page 178 (no. 32) it states "has to be design", which has a very different meaning.
  - Contaminated food is NOT give to mink (R., p. 117) – where is the evidence for this? Botulin poisoning is only a potential risk because of the nature of the food (as with any meat-based products), but to claim that farmers deliberately risk poisoning or use seriously condemned meat is inaccurate.
  - What colour types of mink experience ‘blindness’? (R., p. 117). This is a fiction.
  - In R, page 122 new text have been added: Farmed silver foxes have been claimed to express extreme fear....” Not in W page 131. Fearfulness in foxes is a welfare problem, as is also concluded in W. But “extreme” fear is only rarely seen in some foxes, for example when a group of unfamiliar humans approach the cage.
  - In R, page 125, added sentences “.... Needs of foxes for locomotor.....” Not in W, page 134.
  - In R, page 141, added new text on a German survey with no references, Not in W.
  - In R, chapter 10.11, page 150: the following paragraph (5 in W, 10.15) is missing: “*Mortality and morbidity are generally low and foxes are generally in good physical health*”
  - The following paragraphs are also missing in R (W, page 161/162): “*Transportation is rare since slaughter is carried out on sight*”; “*Ways of reducing fearfulness based on selection are available*”; “*Ways of improving the physical and social environment to attenuate reproductive disorders and reduce monotony are available*”; “*Losses on farms appear to be less than those in the wild...*”
  - Paragraph 4 on chinchilla conclusion, page 157 in R is a new one, no data in W (page 167) support this new statement.
  - In R, page 172, no. 7, a warning stated in W has been deleted: “However, selection which produces excessive exploratory tendencies could have negative effects on welfare”
  - In R, Recommendations, chapter 18, page 159 this text is added: *Until there is sufficient information on the welfare of raccoon dogs, keeping of this species on fur farms should be discouraged* .
- The following is the conclusion on welfare of raccoon dogs from W, chapter 12.2:
- 1 *Although raccoon dogs are in general treated like foxes, there are not enough data to determine whether their welfare is at risk in commercial conditions.*
  - 2 *Their reproduction in captivity appears to be good, and raccoon dogs are generally in good physical health.*
  - 3 *Possible welfare problems include wire floors, barren environments, weaning age, pre-clinical conditions, foot problems, lack of mate choice and monogamy*
- In R, conclusions no. 12, page 176 have been dramatically changed. In W it said: *Generally, compared to other farm animal species, fur animals have been subjected to low or moderate breeding intensity. Furthermore their environmental conditions have changed little over years and are similar for breeding and growing animals. These are both positive factors for the health, coping ability and welfare of fur animals*. In R, it says now: “.....species of farmed fur have been subjected to relatively little active selection....”
  - The kit mortality of 20% is used as evidence that mink experience poor welfare (p. 183), despite the evidence given in W. that this level is the same as that displayed in zoos, and lower than that seen in the wild.
  - The recommendation that kits be left together until nine weeks (p. 184) is potentially dangerous unless this is limited to small litters only, or conducted in enlarged cages, due the risks of aggression. We make this quite clear in W.