



March 12, 2024

Senator Alana DiMario, Chair
Senate Committee on Environment & Agriculture
82 Smith Street
Providence, RI 02903

RE: SUPPORT – S. 2302, Trade in Animal Fur Products Act

Dear Chairperson DiMario and Members of the Committee,

On behalf of the Humane Society of the United States, Animal Welfare Institute, Fur Free Alliance, In Defense of Animals, World Animal Protection, Four Paws USA, Collective Fashion Justice, Project Coyote, Voters for Animal Rights, and our supporters in Rhode Island, we submit the following comments in strong support of S. 2302 to end the sale of new fur products. This bill, sponsored by Senators Gu, Lauria, Murray, Ujjifusa, Valverde, and Miller, ends the sale of new fur products in Rhode Island including fur clothing, fashion accessories and home décor. Recent polling demonstrates that upwards of 70% of Rhode Island voters support this legislation, including Democrats and Republicans alike.¹

I. Impact of S. 2302 on Rhode Island residents and businesses

Ending the sale of new fur products in Rhode Island aligns with the growing national and international sentiment against the fur industry, recognizing the inherent cruelty and environmental degradation. The entire state of California has already banned these products along with many other communities across the U.S. Internationally, Israel passed a fur product sales ban in 2021 and other countries have passed bans or restrictions on fur factory farming. Most fashion brands and retailers are now fur-free due to growing consumer demand for more humane and environmentally conscious products. Legislation to end the sale of new fur products in Rhode Island will contribute to this effort and align with the desire of our citizens to eliminate new fur products from the marketplace.²

S. 2302 will have minimal impact on Rhode Island businesses that sell fur products. According to federal census data, 18 retailers sold any fur in Rhode Island during 2017, the most recent year this data is available.³ As of January 2024, we are aware of only four stores in Rhode Island that sell new fur. Yet, most retailers that sell new fur products stock only a limited range of these items, such as fur-pom hats or fur-trimmed gloves, which can easily be substituted with non-fur alternatives. In 2017, fur product sales accounted for less than 1% of these retailers' sales.

In areas where similar bans on new fur products have passed, such as California, fur retailers remain in business. They continue to provide fur-related services such as storage and cleaning, sell used and vintage fur products, and transition to faux fur options which are increasingly made of sustainable, bio-based materials. With growing awareness of the fur industry's inherent cruelty and the advent of innovative, cruelty-free, bio-based faux fur alternatives, retailers now have the opportunity to adopt more ethical options.

II. Scope and exemptions of S. 2302

S. 2302 seeks only to eliminate the sale of new fur products which are primarily derived from wild animals confined in fur factory farms. The bill includes sensible exemptions for used fur products, taxidermy, and fur from domestic species typically raised for food production, and thus subject to state and federal humane slaughter and animal welfare laws. Animals raised on fur farms in the U.S. or overseas are not subject to these laws and essentially unregulated. S. 2302 also does not prohibit the sale of fur pelts which are commonly sold overseas and change hands multiple times before a retailer sells it as a fur product. Thus, it would still be permissible under S. 2302 for licensed trappers and hunters to sell the pelts generated in the course of their lawful activities. Additionally, as defined in federal code (15 USCA § 69) and reiterated in S. 2302, “fur” is considered animal hair/fur that is attached to skin. As such, it does not include products made only from animal hair, such as paint brushes, felt hats, or fishing lures.

While these details are inherent within the bill language, we recognize the importance of stating them explicitly within the bill to prevent confusion. Therefore, we recommend S. 2302 be amended to mirror the current House companion bill, H. 7454. Based on feedback we received by the Rhode Island Department of Environmental Management (DEM) and in an effort to find compromise with the agency, we made important amendments to the bill language which are reflected in H. 7454:

- The bill now explicitly states that products made only from animal hair not attached to skin (e.g., fishing lures) is not prohibited, based on the federal definition of “fur”.
- Similarly, the bill now explicitly states that pelts are not included in the prohibition, based on the federal definition of “fur product” which is clothing, accessories, and home décor that are manufactured into items. Hunters and trappers would still be permitted to sell pelts they legally obtain. Anglers can still purchase fur pelts for creating fishing flies.
- The bill now includes an exemption for handicraft products, which was a primary concern for DEM. Through this exemption, products made from hunted or trapped animals that are sold in face-to-face transactions, such as farmers markets and craft fairs or even the person’s residence are permitted. This exemption tracks with a labeling exemption outlined in the federal Fur Products Labeling Act.
- The bill includes alpaca to the list of exempt fur products.

III. Purpose of S. 2302

1. Ending the sale of new fur products is beneficial for animals. The vast majority of new fur products come from fur factory farms, where wild animals spend their entire lives in cramped, wire-floored cages, solely for fashion. Annually, over 100 million animals, including foxes, mink and raccoon dogs, are killed for their fur. Since animals held in fur farms are not raised for consumption, the industry is typically not subject to animal welfare or humane slaughter laws, either in the U.S. or overseas. These wild animals are deprived of the ability to engage in natural behaviors like swimming, digging, and running. The living conditions on fur farms often drive animals to engage in self-mutilation, pacing, and other behaviors that clearly demonstrate their suffering.⁴ Investigations across the world show animals living in horrific conditions and neglect. Many are found with open and infected wounds, and others are found dead left to decay in cages next to other animals, and there are even reported instances of cannibalism.

2. Ending the sale of new fur products is beneficial for Rhode Island’s consumers. The processes of tanning and dying fur involve toxic, carcinogenic chemicals, such as formaldehyde, which are used to prevent the skins from decaying. The U.S. EPA has previously fined six fur processing plants for causing high levels of pollution and for using solvents in fur dressing that “may cause respiratory problems, and are listed as possible carcinogens”.⁵ These chemicals can leach into waterways, posing a broad risk to public health. In fact, fur products can contain such high levels of toxic substances and carcinogenic chemicals that the Italian Ministry of Health ordered the withdrawal of certain children’s

fur clothing from the market in 2016 as they exceeded safety standards and were deemed ‘dangerous products’.⁶

Moreover, confining wild animals in close, unsanitary quarters with no monitoring for infectious diseases poses a serious biosecurity risk. Mink on hundreds of fur factory farms in 13 countries across Europe and North America – including four U.S. states– have tested positive for SARS-CoV-2. These fur farms act as mutation hubs, allowing SARS-CoV-2 to mutate on mink fur farms and spread to humans. Wild mink in vicinity of these farms have also been infected with the COVID variant found in farmed mink. Additionally, foxes and raccoon dogs sold on a wildlife market in China have been found to be susceptible to SARS coronavirus, and data has also been published on the presence of SARS-CoV-2 linked to both raccoon dog and fox in a wildlife market in China.

Now, fur-farmed mink, foxes, and raccoon dogs are testing positive for highly pathogenic avian influenza (HPAI), sparking similar concerns over the potential transmission of the disease to humans.⁷ Within these fur farms, there’s a risk of disease spreading through novel mammal-to-mammal transmission. Researchers are calling fur farms “the perfect petri dish for a future pandemic” in reference to HPAI.⁸ In Finland, the public health threat of HPAI has led to the culling of hundreds of thousands of fur-farmed animals. Moreover, HPAI is now spreading throughout U.S. commercial bird populations and there’s imminent concern about its potential presence in U.S. fur farms.

3. Ending the sale of new fur products is beneficial for the environment. According to a recently published report by carbon footprint experts, the fur industry, including the manufacturing of fur products, has the largest negative environmental impact of any material used for fashion, in terms of greenhouse gas emissions, waste runoff, and toxicity.⁹ The water consumption for fur production is extraordinarily high, being 104 times more than for acrylic, 91 times more than polyester, and 5 times more than cotton. The climate change impact of mink fur is at least 6 times greater than that of faux fur.¹⁰ Consequently, advertising standards committees in France, the UK, Denmark, Holland, Finland, and Italy have ruled advertisements promoting fur as environmentally-friendly as “false and misleading.” In 2018, France’s advertising authority stated, “Numerous reliable reports show that the production of fur is extremely cruel and polluting, and that the final product contains toxic substances.”

IV. Conclusion

By passing S. 2302 and eliminating the sale of new fur products throughout Rhode Island, we have the opportunity to increase community awareness of animal welfare, bolster the demand for sustainable and innovative alternatives, and foster a more humane environment. Prohibiting the sale of new fur products and taking a stand against the killing of animals solely for their fur is in the best interest of these animals and upholds the standards of care put forth by our country’s leading veterinary professionals. For all of these reasons, we respectfully ask that the Members of the Senate Committee on Environment and Agriculture support the passage of S. 2302, amended to mirror the House companion bill H. 7454. Thank you for your consideration.

Sincerely,

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¹ Remington Research Group. 2023. Rhode Island Public Opinion, February 2023. Retrieved from <https://drive.google.com/file/d/1PqzSCtaKsfAdML6ROGeB6dqxZsu-lzlf/view>.

² Polling shows that a majority of Massachusetts voters support legislation to stop the sale of clothing and other products containing fur from animals. Humane Society Legislative Fund, Massachusetts voters support ban on fur products (2019). Retrieved from <https://hslf.org/press-release/2019/05/massachusetts-voters-support-ban-fur-products>; Fur Free Alliance, Majority of Massachusetts voters want to make it illegal to sell fur clothing (2017). Retrieved from <https://www.furfreealliance.com/majority-massachusetts-voters-want-make-illegal-sell-fur-clothing/>.

³ United States Census Bureau, Industry by Products for the U.S. and States (2017). Retail sales of women's, juniors', and misses' furs and fur garments. Retrieved from [https://data.census.gov/table/ECNNAPCSIND2017.EC1700NAPCSINDPRD?g=010XX00US\\$0400000&y=2017&napcs=5000375003](https://data.census.gov/table/ECNNAPCSIND2017.EC1700NAPCSINDPRD?g=010XX00US$0400000&y=2017&napcs=5000375003).

⁴ E.g., Pickett, H. and Harris, S. The Case Against Fur Factory Farming: A Scientific Review of Animal Welfare Standards and Welfur, Respect for Animals, 24 (2015). Retrieved from <https://www.furfreealliance.com/wp-content/uploads/2015/11/Case-against-fur-farming.pdf>.

⁵ The Guardian, 3013, Is the fur trade sustainable? Retrieved from <https://www.theguardian.com/sustainable-business/sustainable-fashion-blog/is-fur-trade-sustainable>.

⁶ Fur Free Alliance, 2016, European Commission withdraws children's wear with toxic fur. Retrieved from <https://www.furfreealliance.com/european-commission-withdraws-childrens-wear-with-toxic-fur-collars/>.

⁷ Sidik, S.M. Bird flu outbreak in mink sparks concern about spread in people, Nature (January 2023). Retrieved from <https://www.nature.com/articles/d41586-023-00201-2>.

⁸ Georgia Hulme, Virus in Furs: How fashion-fueled mink farms are the perfect petri dish for a future pandemic (October 2023). The Pathologist. Retrieved from <https://thepathologist.com/outside-the-lab/virus-in-furs>.

⁹ Humane Society International, 2023, Fur industry accused of greenwashing as new report reveals carbon footprint of fur fashion far higher than other materials. Retrieved from <https://www.hsi.org/news-resources/fur-industry-accused-of-greenwashing-as-new-report-reveals-carbon-footprint-of-fur-fashion-far-higher-than-other-materials/>.

¹⁰ Humane Society International, 2023, Fur's Dirty Footprint: Report on the environmental impacts of fur production. Retrieved from https://www.hsi.org/wp-content/uploads/2023/06/HSI_UK-Furs-Dirty-Footprint_Jun23.pdf.