



INTERNATIONAL  
**I F F**  
FUR FEDERATION

February 5, 2019

Date: 2/6/18  
Submitted in PAW Committee  
Council File No: 18-0538  
Item No.: 10  
Deputy: Adam R. Lid

**Re: Global Certification Proposal Catalyzed by Proposed LA Fur Ban**

Dear Members of the Personnel and Animal Welfare Committee:

We are writing on behalf of the international fur industry and thank you in advance for taking the time to listen and consider the issues that we raise in this letter. Your Personnel and Animal Welfare Committee has raised a direct and forceful challenge to the fur industry to examine practices and procedures, and to identify positive, meaningful steps we could take that would result in improvements in animal welfare that would not only impact the fur industry but, by example would likely impact policies and care guidelines in other animal use industries as well.

We have developed a program that we believe will be a victory for Los Angelenos concerned about the continued ethical treatment of animals. It would also be an opportunity for you to put LA in a global leadership position on the issue of animal welfare without sacrificing the freedom of choice that is so important to consumers, allowing them to exercise their concern for the environment by choosing to purchase a natural, sustainable product like real fur versus the plastic or synthetic petroleum-based fake furs. And in the end, this program will do far more to address animal welfare standards than the proposed fur ban ordinance due to a prevailing California law that allows for many furbearer species to be sold throughout the state and the fact that consumers will simply go outside of Los Angeles to purchase fur. We urge you to delay discussion of the proposed ban to allow us the time to further discuss this proposal with you.

Over the last few years, our industry has worked hard to address the demand for responsible, ethical sourcing on behalf of major brands including LVMH, Fendi, Balenciaga, Saint Laurent, Loro Piana, Valentino and many others. For the brands and their consumers our key objective has been to develop a certification program that would manifest consumer transparency, ecological sustainability and the continued humane treatment of animals as its abiding principles. Fur products eligible for certification would remain identifiable and traceable throughout the supply chain. For consumers considering the purchase of a fur product, the certification standard would offer recognizable and verifiable assurance that the product has met the highest standards in environmental responsibility and the continued humane treatment of animals. In an era of ever-increasing consumer awareness these brands must respond with rigorous programs that guaranteed the highest levels of ethical, responsible sourcing and their endorsement suggests we have provided them with what they need.

The result of our efforts is FurMark, a new world-class, comprehensive certification and traceability program nearly ready to be launched providing reassurance to buyers, designers and others that animal welfare and the dressing/dying process in the fur supply chain is sustainable and independently verified at each step in the process. We would be excited to make history with Los Angeles as the first city in the world to introduce this certification program that provides comprehensive consumer education and transparency.

FurMark's key principles are:

- Programs are based upon Science: third-party animal welfare experts have had input into

the fur farming standards that have been revised and updated in the U.S., Canada and Europe;

- Independent – third-party animal welfare auditors will inspect all fur farms to ensure compliance with the standards. The third-party oversight to ensure animal welfare for wild sourced fur occurs at the two auction houses that sell wild fur in North America. (NAFA AND FHA). Both auctions have contractual agreements with the Ministry of Natural Resources that permits government inspectors to routinely inspect wild fur pelts that come to the auctions. They are inspected for trapper licenses, and the pelts are examined. If the inspectors question whether the animal was trapped legally, the pelt will be seized and an investigation launched. The government also conducts routine audits on the wild fur auctions to ensure harvests are within government mandated limits and all other wild life laws are respected.

- Transparent – certification programs and their individual protocols are publicly available.

In order to be FurMark certified, the fur farm must be inspected and re-inspected every 14 to 18 months to retain their certification status. FurMark sets high standards to protect animal welfare. The program is based upon science and the independent farm inspections will ensure that the animals are impartially assessed for health and welfare.

For dressers/dyers to be a part of the FurMark system, they must follow strict compliance rules and guidelines on the use of chemicals:

- They must produce a certificate of government inspection;

- They must agree to have a small portion of their dressed pelts independently tested to ensure the chemicals used are within government guidelines.

Traceability is also part of the FurMark system. A cloud-based program is being set up to follow the pelts from the auction houses through to the manufacturing stage. This will be the most comprehensive and robust system ever implemented in the fur industry.

The fur industry's practices are far superior and more responsible than what our critics contend. Yet at the same time, we also believe our industry is perhaps uniquely situated among the multitude of other enterprises engaged in animal products to develop and implement new, continually evolving, independently verifiable standards of excellence and ethical treatment that would be unprecedented in global commerce and would, in fact, drive other animal use industries to more innovative solutions. Although much of the detail involved in the FurMark Certification Standard is necessarily specific to the fur industry, it's abiding principles and framework are readily adaptable as a model for other businesses engaged in commercial uses of animal products. A successful and workable program launched in Los Angeles would strengthen adherence to animal welfare and environmental priorities worldwide and offer an example to other industries whose consumers would also benefit from similar approaches to stronger enforcement, accountability and transparency of information about the products they may consider for purchase.

Why hasn't this been done before? The fur industry is international, operating under a variety of certification programs and licensure policies that are national, statewide and provincial, and that are, in many cases, also subject to the tribal sovereignty of indigenous and First Nation communities. Although these diverse sources of legal and regulatory guidance have helped to inform our approach to industrywide standards, they have also lent complexity to it.

Rather than merely adopting a ban that is neither based on fact nor real considerations of sustainability or environmental concerns and that would result in the loss of millions of dollars in tax revenues and jobs as well as the likely increase in retail vacancies in the city's core, we urge you to consider this proposal. The proposed ban, which still allows for the sale of a wide range of fur types will have little impact. Those that seek the limited items that cannot be purchased in LA will access them through stores just outside LA or via e-commerce. It also sets a very dangerous precedent in opening the door for further actions against leather and wool, already the focus of active animal rights campaigns.

The consumer has spoken and the prominence of fur for the fall 2018 collections just reflects the popularity of fur fashion and the strong consumer demand. Simply put, there is no greater arbiter of consumer attitudes than the cash register. If consumers didn't want real fur, retailers would not be offering it and manufacturers would not be producing it. In the absence of real, natural fur retailers will likely move to "faux" fur to meet this demand. Natural fur is sustainable, renewable and environmentally friendly and strict animal welfare standards are in place in the U.S and North America to ensure the humane treatment of animals. But the "faux" fur product available today is the complete antithesis of the ideals of sustainability and the concept of responsible

environmental conservation that reflect the core values of Los Angeles. By inadvertently promoting faux fur, a petroleum-based product that is not renewable, sustainable or biodegradable, and releases thousands of tiny plastic lint fibers into waste water when washed that are then released into oceans and rivers where they are ingested by fish, mammals and sea birds, this proposed ban directly contradicts the many positive environmental moves the LA city council has taken regarding plastics and Styrofoam.

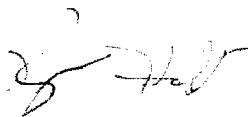
The vast majority of consumers — in Los Angeles and around the world — make consumer choices every day that involve the use of animal products. Among the multitude of such products, those produced by the fur industry are targeted perhaps because they are the most expensive and least well understood. Recognizing our responsibility to do more as an industry to improve transparency and enhance standards, we offer a groundbreaking proposal that will empower informed consumer choices, that will improve standards and practices worldwide, and that embodies values we believe we share with the large majority of Los Angelenos.

On behalf of the industry organizations listed below, we welcome the opportunity to discuss the program and related efforts with you in greater detail. We also invite opportunities to meet with or answer questions from city policymakers to elaborate.

Sincerely,



Marcie Rea  
Chairman  
Fur Information Council of America



Ryan Holt  
Chairman  
International Fur Federation/Americas