

Environment, Food and Rural Affairs Committee

Oral evidence: Fur Trade in the UK, HC 823

Wednesday 18 April 2018

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[Watch the meeting](#)

Members present: Neil Parish (Chair); Dr Caroline Johnson; Kerry McCarthy; Sandy Martin; Julian Study.

Questions 146 - 314

Witnesses

I: Ceri Davies, Operations Director, Camden Market; Lesley Smith, Director Public Policy, UK & Ireland, Amazon; Kate Burns, General Counsel, Not on the High Street; Nicola Tudor, Trading Standards, LB Tower Hamlets.

II: Mette Lykke Nielsen, Chief Executive Officer, Fur Europe; Michael Moser, Chief Executive Officer, British Fur Trade Association; Mark Oaten, Chief Executive Officer, International Fur Federation.

Written evidence from witnesses:

- [Fur Europe](#)
- [British Fur Trade Association](#)
- [International Fur Federation](#)



Examination of Witnesses

Witnesses: Ceri Davies, Lesley Smith, Kate Burns and Nicola Tudor.

Q146 **Chair:** Good morning. Thank you very much for coming to our inquiry concerning fake fur versus real fur. Starting with Ceri on the outside, please, if you would like to introduce yourselves, and then we will kick off.

Ceri Davies: My name is Ceri Davies. I am the operations director at Camden Market, so I am responsible for the day-to-day of what happens within Camden Market.

Lesley Smith: My name is Lesley Smith. I am director of public policy for Amazon.

Kate Burns: I am Kate Burns. I am the general counsel of notonthehighstreet.com.

Nicola Tudor: Nicola Tudor, trading standards, London Borough of Tower Hamlets.

Q147 **Chair:** First, to Amazon and Not on the High Street, could you just give us a brief outline of exactly how your online business works?

Kate Burns: We are a curated online marketplace. That means that we carefully select the businesses that we put on our marketplace and then connect them with the rest of the world. That comes with opportunity, which is that we are able to connect over 4,000 small creative British businesses with the rest of the world. It also comes with challenge, and, Mr Chairman, I wrote a letter to the Committee last night about some challenges, which I am happy to talk about whenever convenient.

Q148 **Chair:** We appreciate the letter, thank you. Do you want to say a little bit about that letter?

Kate Burns: Of course. We originally had one product brought to our attention by the Humane Society back in December 2017. We acted upon that, and I can go into more detail on how we acted upon it later. Yesterday, the Humane Society brought to our attention that a further 10 products had been found on our website that were down as faux fur and were actually, in their belief, real fur.

We have taken that very seriously. It is the same partner that had been the issue back in December. We have suspended that partner immediately. Today we are in the process of removing all faux fur products from our site and will not put them back up again until we absolutely can guarantee that the real fur cannot come back on to our site. We are looking to engage or work with a third party to audit our processes and systems to make sure that, going forward, we can get this right. The new checks we had previously put in place clearly were not good enough.



Q149 Chair: Back in December, you relied very much on the partner that was supplying these goods to make sure that they did a proper audit. Obviously this did not work, did it? Are you actually suspending having any more goods from them, or are you convinced that this time they will actually do a proper audit? The whole idea of this inquiry is to bring this out into the open. I am not saying it is always easy to find the product, but it has to be highlighted. I am sure you, as a retailer, take it very seriously, but it has to be stamped out if we can.

Kate Burns: I completely agree. We were very disappointed to hear the news yesterday, and we are very sorry that the Humane Society had to work out that someone was in breach of our terms and conditions. In answer to the first part of the question, we put in place checks in December. We have very thorough and clear terms and conditions, but we did not just rely on our partner to comply. We also instituted checks—daily checks on every new product coming on to the site, and then monthly checks of all the live products on our site. That was through a keyword search in the product description, and that clearly was not enough.

It is the second time that the partner in question has been in breach of our terms and conditions, so we are in very serious conversations with them today. All their product range has been suspended from our site, which is a very serious sanction for them, because it is their livelihood. We take that very seriously, and we are having a very serious conversation with them today. Going forward, having shown that our checks really were not adequate, we are going to change that and work out what we can do differently.

Q150 Chair: I suppose the blunt question is, if the Humane Society can find it, why can you not? It is good that the Humane Society have found it, but it should not be necessary for them to do that. You, as a retailer, should find it yourselves, really.

Kate Burns: I absolutely agree with that, and we are very sorry about that. As I said, we have thorough terms and conditions; they are very clear terms. We are a no-fur site. We have a restricted products policy. The partners that join our site want to sell with us because it is a great way for them to earn their living. Therefore most of them comply with our terms and conditions. This is one instance of a partner breaching our terms and conditions twice. We will act on that.

We had 10 products that were brought to our attention yesterday by the Humane Society. One was a product that had been mentioned in December, which we had suspended but that our partner had been able to un-suspend, which I am looking into. Two of the products were products that the partner had reassured us were not real fur and then have turned out to be so—she had been reassured by her supplier on that front. Seven of the products did not have “fur” in their product description, so our checks did not pick them up. We are going to change the way we check our products as a result.



Q151 Chair: I have made this point before in this inquiry: the problem we have is that, now, the price of real fur in China is probably as cheap as that of fake, and I imagine probably the welfare conditions are pretty horrendous. Of course the trouble is, naturally, if you are a Chinese producer, you are not really going to look at the welfare considerations. You are just going to look at the product and think, "If I can put real fur in instead of fake fur it looks good. I am going to sell it". We and all of you in the retail trade are going to have to be even more vigorous, because I cannot see this stopping particularly quickly, because of the way the market is working in China.

Kate Burns: In our experience, it is the cheap imports that are a problem for our partners and the fact that some of their suppliers have been lying to them. We have already done a great deal to help. They are small British creative businesses. They often do not have the resource to be able to understand this. We have been educating them already. There is further education that can be done to help them comply with the same standards as a big retailer can. Also, as you have just said, we should be working across the retailer community to help this, and also with people like the Humane Society and PETA to help us make sure our policies and procedures are working properly.

Q152 Chair: Just a general question: do you think there are enough people within your business, and at businesses generally, to be able to check the difference? It is not that easy. There are ways you can tell real fur from fake fur, but it is not particularly easy. Do you think you have enough people and there are enough people out there that do the checks?

Kate Burns: That is something we will have to look at as part of our review, after what occurred yesterday.

Q153 Chair: Amazon, how does your online business work?

Lesley Smith: We are slightly different to Not on the High Street. Part of our site is a marketplace; part of it is retail. Of the items sold on the UK site, about half are sold by us and about half are sold by third-party sellers. The majority of those sellers are small British businesses—so tens of thousands of small British businesses. Fashion is not the majority. It is a relatively small category.

We have about 30,000 apparel sellers on the site, and we have had a no-fur policy since 2014. When we instituted that, we barred immediately about 300,000 products from the site. We have subsequently updated that, and we have rules to check that no one is selling fur. That is partly search, that is partly audit, and we update that very regularly.

Q154 Chair: Did you say 300,000?

Lesley Smith: Yes, because those were fur products, so we barred all fur. Subsequently, only the sale of fake fur is allowed. Since then, we had the same problem. HSI identified failures on our sites last summer.



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They bought, I think, six products, of which, in fact, one turned out to be fake fur and five were fur, all of them advertised as fake fur. They then had a long list of other products that they had not bought but that they thought, by looking at them, might be fur, and we bought the rest that were still available and tested them. Some of them we tested with visual tests, some of them we tested in a lab, and more of them turned out to fail than we would have wanted. Some of them were in fact the same products as we had seen on other sites. I know that you had House of Fraser here, and they had a problem with a particular pair of gloves. We had the same pair of gloves.

All those sellers were contacted. We then subsequently interviewed all the sellers and went through and asked whether they understood our policy and whether they understood how to identify fake fur. All of them said they knew our policy. Our policy is very clear: you may not list a fake fur product. If we identify a fake fur product, it will be removed from the site. If you are non-compliant, ultimately you could lose your selling privileges. That is a severe thing for companies for whom it is their livelihood.

We interviewed the sellers and asked them what checks they had and how they were identifying that something was fur. Most of them actually did know. They went through unprompted and outlined the tests that they do, which are very similar to the HSI tests. It is feel; they look at the skin and whether there is skin at the bottom; they look at the end of the bits of hair. A couple of them also mentioned the burn test and said they could smell. Some of them had visited their manufacturers. Some of them had audited.

What happens sometimes is that they are buying whatever it is—a bobble hat—and they will have a supply chain for that bobble hat. It will be a wool hat with a fake fur bobble, and they will get however many they order—100, 200 or 300. At some point further down the supply chain, someone runs out of the acrylic bobble and substitutes something they have not audited. It is a process failure, but it is a process failure because someone further down the line has sourced something where they said they were not sourcing it. It is genuinely quite hard to track.

They understand very clearly what our requirements are. Subsequently, we have a site called Seller Central, which provides information for all our sellers. Of course, bear in mind our sellers are across all sorts of different categories, from garden furniture to toys, to books, to fashion. There are lots of different restrictions in different categories, including no animal content. We have a list. It is not only fur. We then emailed them all to reinforce that.

Q155 Chair: Can I just stop you there? The Humane Society supplied us with an email thread, which seems to suggest a lack of interest and engagement from you at Amazon on this issue. It is good that you are taking this response now, but is this the fact that there has been so much



publicity, you are here before the Select Committee and all this interest has been taken in the media? This is what we are trying to drill down on: did you act quickly enough? Were you interested enough until the time came when there was much more publicity and then, being perhaps slightly cruel, you were much more interested?

Lesley Smith: I do not think that is fair. I have not seen the thread from the Humane Society. It would not have come across my desk, so I do not know. You will understand we have a lot of contact from lots of organisations. With the Humane Society, I know someone in the fashion team was due to meet them, and then I think something went wrong on the timing. The BRC convened a roundtable, and my understanding is they are continuing to do that. We have talked to the BRC about guidelines they are providing for retailers. I do not think there is a lack of commitment. It is hard to believe that Amazon has quite a stretched team, but it does have quite a stretched team. We are quite a lean organisation, but I do not think there would be any lack of willingness to engage. I regret if that is the impression that has come across.

Q156 **Chair:** I understand it is quite difficult. I understand that, through the supply chain, they can change the product and you do not always know. We are trying to find out whether a company like Amazon has the right checks and balances in place and reacts quickly enough to this. This is what it is. We would not be having this inquiry today if action had been taken more quickly, basically. Are we confident, and are you confident, as Amazon, that not only are you stopping it now but that this will not happen again in the very near future?

Lesley Smith: What we have to do, rather like Ms Burns said, is make sure we have the education in place and we have the checks in place. We have a lot of sellers, and very different kinds of sellers—large ones, small ones. House of Fraser is a seller on amazon.co.uk. There are lots of big brands. There are lots of tiny brands. Because of the variation in their size, in some cases you would need to do more to ensure that they have the right information.

We have reinforced our communications with sellers. We sent out the HSI guidance, or our version of the HSI guidance, to remind them, "This is how you do the checks". Most sellers do not want to lose the opportunity to sell, and they will lose the opportunity to sell. We are very clear. We understand mistakes can be made, but if you persistently are not compliant with our policy, then you will not be able to sell on Amazon.

Chair: Naturally, this is all evidence that we take and record. Naturally, we hope that you can stamp this out, because it is right that we buy what we expect to buy when we buy from you and across the online sales.

Q157 **Kerry McCarthy:** We have partly covered some of this ground already—this is again to Amazon and Not on the High Street. We had been told that a response had come back saying, "We are just the platform. We



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are not responsible for what our sellers sell through us". Your responses so far seem to indicate that you feel that you very much have a responsibility for what is sold through your sites.

Lesley Smith: I can understand there is an oversimplification. In the evidence of HSI, there was clearly some confusion as to whether we were the seller or not. The lady who was giving evidence said repeatedly that it is fulfilled by Amazon, so they are selling it. That is not the case. When you are a customer and you are buying from us, if you are buying something, it will say, "Sold by Amazon and fulfilled by Amazon". That is us as the seller. If it says, "Sold by"—I do not know—"Marie Jo Fashions and fulfilled by Amazon", then the seller is Marie Jo Fashions. The fashion brand can receive the order and fulfil from its own warehouse, or very often its own shop. Very often, it is a shop that has already got an infrastructure for fulfilment, but they just want to do additional sales through us. If they do not have that kind of infrastructure, they can put things in our warehouses and we will do the fulfilment, but they remain the seller. They have the legal contract with the customer. We still say if you are selling on our marketplace, "You must fulfil our requirements; these are the restrictions. You may only sell these products and not sell these products".

Q158 **Kerry McCarthy:** You are saying you would not be legally responsible, having sold a product that had been mis-described, but you feel that you still have a responsibility, or they have a responsibility to you to meet your terms and conditions.

Lesley Smith: Yes. We are very clear that we will provide education. We provide as much information as we can to help them fulfil their responsibilities. However, we are much more like Westfield or Brent Cross, rather than a shopkeeper, in that regard, because they are running their own shop within our site, or their own retail operation within our site.

Q159 **Kerry McCarthy:** When you say that you communicate this information, presumably this is by email.

Lesley Smith: Yes.

Q160 **Kerry McCarthy:** Does this go to everyone that you do business with, or is it somehow specific?

Lesley Smith: It is specific. On this, we emailed all fashion retailers.

Q161 **Kerry McCarthy:** Not on the High Street, do you have anything to add to what you have said? You sound like you had already tried to follow up with as many of your vendors as possible. Are you confident that it is not going to happen again?

Kate Burns: Just to go back to the responsibility point first, we are an online marketplace, and we have to balance very carefully the difference between the independence of our retailers and the importance of making sure that our customer is getting the right deal. Are we confident this is



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not going to happen again? Hopefully you have had a chance to read the letter I sent yesterday, which is that it did happen again and we are very disappointed and sorry about that. At the moment, we are taking down every single faux fur product on our site, and they will not go back again until we can guarantee that the provenance of that fur is the right provenance.

Q162 Kerry McCarthy: As we have already heard with the example of the bobble hat, it could be that, somewhere in the supply chain, something goes wrong further on. How would you protect against that?

Kate Burns: As Amazon have mentioned, that comes down to education. In particular on our platform, with small creative British businesses, struggling with very limited resources, often working out of their kitchen or their attic, we want to do everything we can to support them to be able to live up to the same standards as a larger retailer.

Q163 Kerry McCarthy: Obviously you are two examples of marketplaces. Is there a danger that these products will just end up being shifted to another outlet if Amazon and Not on the High Street crack down on them? You obviously have a very large reach to consumers, and people would want to sell through your portals. Do you think that you have enough leverage to persuade them to change their ways, or will they just go elsewhere?

Lesley Smith: You have to hope that what you are doing is basically closing down the avenues to sell those products. There is no law against selling fur. We choose to have a policy where we do not sell fur, but theoretically, yes, people who cannot sell through us may find other channels in the short term, or they may decide that, actually, it is too difficult.

Q164 Chair: Your policy is not to sell fur, but surely if you are buying fake fur but you actually get real fur, that is a mis-sell, is it not?

Lesley Smith: Yes, absolutely. Our policy is not to sell fur, full stop, other than fake fur.

Q165 Kerry McCarthy: There is your policy, but then there is also a legal trading standards issue. We will not come on to trading standards now.

Lesley Smith: Yes. Obviously we want our customers to be clear that what they see is what they get. That is what should happen.

Q166 Chair: Do you report them to trading standards?

Lesley Smith: We have not necessarily reported them to trading standards. We have only had one case raised by trading standards in this. We have taken action with sellers and said, "You need to remove this product. Here are the rules you have to comply with". In some cases—in many cases, I suspect—it is a small part of their range. They may be selling winter coats in the winter and summer dresses in the summer. For a small part of their range, for a small period of the year, it



may include fur at the cuffs or whatever, as long as that is fashionable. It does not necessarily mean that seller is out to hoodwink our customers or us. Most sellers want to protect their brand too.

Q167 **Kerry McCarthy:** You seem to be working on the assumption that the sellers have been misled somewhere down the line and that they are doing it innocently.

Chair: They may not be.

Kerry McCarthy: Are you right to think that?

Lesley Smith: We interviewed a lot of the sellers that were on the HSI list, and we will continue to do that. We wanted to get a sample. It was unprompted. They knew what our policy was and they knew what the rules were. They appeared to have reasonable measures in place to try to protect themselves to ensure they were selling the right things, some of which had failed in these instances. We were not coming across sellers whose only role was to try to put this stuff on the market. It seems to be people who are buying stuff—buying trim, or buying hats or garments with trim—where the checks have broken down at some point. They did not seem to be unaware of our policy.

A couple were unaware of the policy, but the ones who were unaware of the policy maintained they did not sell fur. They said they did not sell fur, but they in fact had sold some garments that had a minor amount of fur in the trim. They did not think of themselves as fur sellers. That is part of the problem. This was a jumper that had a little bit at the cuff, and we said, "That counts". That is part of the mismatch. They did not really think of themselves as being fur sellers. It could have been sequins; it could have been fur.

Q168 **Kerry McCarthy:** That sounds like they were not that fussed about whether it was real fur or faux fur, so now they need to know.

Lesley Smith: By that time, they were. In some cases, people buy 300 jumpers—some pink, some green—with trim, and in most cases the trim is braid, and in a few cases the trim happened to be fur. They had not done sufficient checks where it was fur, and now they will do sufficient checks. They have been made aware of the rules.

Q169 **Chair:** You do not seem to be terribly concerned about the knock-on reputation to yourselves. Whether the people have traded through your company—through Amazon and Not on the High Street—and whether it was mistakenly put into the market or not, it has to be stamped out. You are mis-selling a product. It is interesting that you have not considered putting it to trading standards. I am just not entirely certain you are actually taking it seriously enough. I think it is going to get even more apparent as that real fur is traded so cheaply in China. I am not certain that either of you have really convinced us yet that you are taking this seriously enough. I would like to bring Not on the High Street in again, please. Have you reported any of the companies that have traded real



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fur instead of fake fur with you to trading standards?

Kate Burns: No, we have not. As we have said before, often this has occurred through a mistake. If we become aware of something like this, part of the way we work is to help these small businesses develop. We take on board 4,000 businesses that we know fairly well. We work with them to develop their businesses. Therefore, if something like this occurs we work with them to educate them.

Q170 **Chair:** Can I just interrupt you there? Surely when you had the problem with this particular company—and you had a case back in last year—then, in a way, that was fair enough to go back to them and say, “You have traded real fur for fake. Sort it out”. When they do it again, surely that is the time then to call in trading standards, is it not? How many times do they have to trade real fur as fake fur to you before you feel it should be reported to trading standards? Or do you feel perhaps you are never going to do that?

Kate Burns: We are talking with this particular partner. She has been suspended from our site. We are talking with her today. She has breached our terms and conditions twice, so that is a very serious conversation we are having with her. We should consider working with trading standards more closely. As I said, we would like to get our policies and procedures reviewed, and trading standards is one of the things that I think, absolutely, we should be taking into account.

Q171 **Chair:** We are going to go on to talk about trading standards in a minute. You will have a chance to comment. This is a really interesting point, because, like I said, I just wonder how many times one has to offend. If Sky, the Humane Society, the BBC and others had not brought all this to our attention and to your attention, you would not be necessarily in here this morning. Would you actually be doing as much about it as you are? This is the bit that worries us, basically. There is not too much reassurance yet.

Kate Burns: I can understand that. We are taking it seriously, and we do take responsibility for it. This is the first time that this has occurred in relation to fur. In relation to other issues that have come up in non-compliance with our terms and conditions, we have closed partners down.

Q172 **Sandy Martin:** We have an interesting situation here because, clearly, the majority of the fur, whether it is being sold as fake fur or as real fur, is not being sold illegally in respect of being fur. It may be illegally labelled, but unless it is dog, cat or seal, it is not actually illegal. It is still perfectly legal to buy all other forms of fur in this country. Despite the fact that it is legal, there was only £42 million-worth of fur sales in this country last year. Clearly the British people do not buy fur, even though they are able to legally. In that case, the normal expectation would be that they do not want to buy fur—that if they buy faux fur, they are expecting it to be fake. According to trading standards, it ought to be fake because it says it is fake. By selling something that is really fur, you



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are actually selling something to somebody that they do not want. They do not want to buy real fur.

Given that you have policies not to sell real fur and it is being advertised as fake fur, it is important to you, surely, to make sure that you test it and that it is labelled in such a way that it is telling the customer what they want, which is fake fur and not real fur. Would I be right in thinking that? It is important to you. It should be important to you that your customers know that, if they are buying something from you that says it is fake fur, it is fake, not real.

Lesley Smith: Yes.

- Q173 **Sandy Martin:** Good. If the Humane Society is so easily able to test things that say “fake fur” and find out that they are real fur, why can you not do the same? You said you had not seen the email trail, Ms Smith. I am actually quite astounded that you have not seen the email trail. If I was coming along here to give evidence on something where I knew that my company had already been picked up on several occasions by the Humane Society, and it had been flagged up that we had not responded, then I would have wanted to know exactly what had been said. On 20 December, right at the end of last year—this was after eight months of pushing—the Humane Society made it clear that they had brought up six items. They selected six of your items that were advertised as faux fur. They sent them to a laboratory and every single one of them proved to be animal fur.

Lesley Smith: These are the ones that we did follow up. We did follow up these. Actually, five out of six were fur. We also tested it; we took it to a laboratory. The one that was sold by Amazon was in fact fake fur, not real fur. We then tested the rest of the products on their list and went through that, and that is what I was referring to at the beginning. We went through their products. More of them were real fur than we expected. That was a very bad thing to discover. I have not got the email in front of me, but our intention is not to not engage with HSI. We followed up on their list and we will continue to, and we have also distributed the guidelines that they provided to all our sellers.

- Q174 **Chair:** Sorry to interrupt, but I think the point that Sandy makes is a good one. You must have been more than aware that this trail of emails was there and that the Humane Society had to pursue you for so long. I find it interesting that you do not seem to have seen these emails. If you have not seen these emails, who responds to them? How does it work? It seems to be odd that you say you have not seen them.

Lesley Smith: There was a process failure on our part.

- Q175 **Chair:** If you are coming in here to give evidence before a Select Committee, I would have suggested that might have been the first thing I would have done.

Lesley Smith: No, I think that is a process failure on our part. I asked to see the emails, and I have not seen those particular ones. That is an



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error on our part. I was aware they had contacted our press office, and I was aware that they were trying to arrange a meeting with the BRC, which we tried to take part in and could not, because, in the end, the date was agreed very late. However, we did have the dossier, and we went through every single item on that dossier and every single seller on that dossier.

The policies are already there. The guidance is on our internal Seller Central site, but we rearranged that guidance to make it more prominent. We included the HSI tests. We then emailed every single seller in our fashion category to make sure they understood that.

Q176 **Chair:** This is after eight months of pursuing it, is it? This is where I think your situation on this is quite weak. Like I said, you do not seem to have seen these particular emails, and there does not seem to be any real urgency.

Lesley Smith: With respect, Chair, we took it very seriously, and we do regard it as urgent. HSI have done us a great favour in some regards. It is very important to us that our customers understand what they are buying and that what they buy is what is advertised. We want to put this right. It is absolutely not in our interest to have any seller on our site misrepresenting what they sell.

Q177 **Sandy Martin:** If I could go back to what it says in the email, they selected six faux fur items. You say one of them actually was artificial, but the fact is still five out of six. Do you believe that they did an initial assessment, like a finger test, to tell whether or not they thought it was likely to be fur, or do you think that it is likely that five out of six of every single one of the items that you are selling as faux fur are actually real fur? Statistically, if somebody picks a small sample and every single one of them is wrong, then the assumption is that every single one, or almost every single one, of the things listed as faux fur that you are selling, whether it is your own products or products you are selling on behalf of somebody else, is likely to be real fur.

Lesley Smith: My understanding is not that HSI took a random sample. They presented a list of products they thought were wrong, so it is not a random sample. It is not a sample of all the fur. My understanding is it is not a sample of all fur items. It is a sample of, "Here are six we believe are real fur that should be fake fur".

Q178 **Sandy Martin:** Did they tell you how many they had sent to the laboratory for testing?

Lesley Smith: Six.

Q179 **Sandy Martin:** No, they sent six to the laboratory for testing, and six of them turned out to be real fur.

Lesley Smith: Yes, they sent six. They sent six.

Q180 **Sandy Martin:** They only sent six, and six of them turned out to be real



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fur.

Lesley Smith: They selected six, and they did the finger test. They selected six that, in the first place, they believed to be real fur. I am not sure they did send them to a laboratory. They did the visual and the burn test, and they were right. We bought the same six, and in our case we sent them all to the lab, and five of the six turned out to be. To be honest, what is more important is we then interviewed all the sellers and went through the process again.

Q181 **Sandy Martin:** All those six sellers.

Lesley Smith: All those six sellers and the sellers of the rest—

Q182 **Sandy Martin:** Yes, but what about all the other sellers that do faux fur—every single person who is selling something called faux fur?

Lesley Smith: No. We have not interviewed every single seller.

Q183 **Sandy Martin:** I come back to my point, Ms Smith. Statistically, it was five out of six or six out of six; if five out of six of a sample prove to be real fur, then surely the assumption is that almost all the other things that are listed as faux fur that are being sold through Amazon are real fur.

Lesley Smith: My understanding is this is not a sample of all fur. It is a sample of things that they believe failed, which is quite different to a random sample.

Q184 **Sandy Martin:** Do you believe that they went through a very large number of faux fur listed items from Amazon and tried them out with their fingers and then selected the six that they sent to the laboratory?

Lesley Smith: No. My understanding of what they said is they only bought six.

Q185 **Sandy Martin:** They only bought six items.

Lesley Smith: They bought six, which they believed from visually looking at them were genuine fur, and they turned out to be right.

Q186 **Sandy Martin:** So if their visual looking at them, for six items out of your stock, is that accurate, why can you not do that sort of test yourself, and why, indeed, can Ms Burns not do that sort of test herself? I am struggling to understand why the Humane Society is so much more capable of detecting whether something is real fur or not than you or Ms Burns are.

Lesley Smith: I do not believe they are. I absolutely accept this is a problem to which they alerted us, because we thought that our policies were adequate and that the tests we were doing were adequate, and that we would pick it up. That has clearly been a mistake. Since that time, we have gone back to every single seller in the fashion category, many of whom do not sell fur at all in fact, and said, "You need to understand



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what the policy is. You need to have processes in place that use the same tests that HSI use, so that you can satisfy yourself. If we find that you are presenting goods to our customers for sale that are not what you have represented them as, those products will be removed and, potentially, if you continue to do it, your whole stock will be removed and you will not be able to sell”.

I completely accept that, at that point, we had not done sufficient testing, and we have done quite a bit more since. We will continue to reinforce that policy and continue to reinforce that education.

Q187 Sandy Martin: Do you think there is anything that you could put on the labels or that you could ask your sellers to put on the labels that might make the position a bit clearer for the consumer?

Lesley Smith: Sellers, and all retailers of fashion, have to comply to European labelling requirements. I know that was discussed at the Committee last time: that European labelling requirements fall short. Angora, for example, is classed as wool. I know one of the products that came up last time had rabbit fur on it, and, technically, they could have got away with that under it being classed as wool. Members of Parliament may want to consider the labelling requirements. All we can do is say, “You must adhere to the labelling requirements”, but the labelling requirements do not necessarily help customers in quite the way that they should.

Q188 Chair: The labelling from the European Union is quite complicated. We might well have the opportunity to make it clearer as we leave if we have a British labelling system. Both Amazon and Not on the High Street, what would you like to see? What would you like the future label to say to make this clearer? You are the people selling the product, you see, and that is why we are very interested in how much interest you take in making sure that what you are selling is not real fur. It is no good just kicking the ball back into our court. We are not selling fur. You are. You are selling fur instead of fake fur, so what would you like to see on the label that would make that clearer?

Lesley Smith: To be honest, once it gets to the labelling issue, in a way it has already failed. Our job is to keep fur off the site, whether it is labelled or not. It should not be there. Knock out the 20% requirement. You would need to think about how you categorise what is fur and what is not. Angora at the moment is classed as wool, not fur. You would probably want to change those rules and say, “If there is any fur whatsoever, it must be identified on the product, even if it is lower than the threshold requirement at the moment”.

From our point of view, the labelling is one part of that battle. In some cases, where it is a minimal part of the product, it is not required to be on the label anyway. You would probably want to ensure that you identify all the fibres that are present. From our point of view, we want



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to ensure that our sellers absolutely understand it should not be there at all, even if the percentage is tiny. It simply should not be there.

Q189 **Chair:** I accept all that. That is not the question. The question is, if you could have a clearer label, what you would like to see on it. Surely it is easier to have that from the people that you buy from, and then you sell again, whether you sell it directly or through a franchise or whatever you do. In the end, if someone buys from Amazon or Not on the High Street, they expect you to have some guarantee. We are trying to drill down on some practical steps. I will perhaps bring in Not on the High Street now. Kate, can you give us some ideas where you think it could be clearer so that it makes your job clearer, easier, and people actually get what they think they are getting, which is fake fur and not real fur?

Kate Burns: What we ask our partners to do when they put a product on our site is explain in the product description what that product is made from. That has been inconsistent in relation to faux fur. In relation to other products, where there are clear regulations in place, we ask for the certification or for the documentation that goes behind that product. For example, for toys, we would expect that to be provided when the product is uploaded. There is nothing like that in relation to faux fur and fur. I cannot say exactly what I think should be on a label, but what I would like to see is some audit trail.

Q190 **Chair:** You think some sort of certification to say what it is.

Kate Burns: Yes.

Chair: Yes. That is an interesting point because I think we can improve on this. I forget exactly what it says on the European regulation, but something like, "This is not of animal origin", and it is fairly complicated and fairly difficult to understand. I think it can be misinterpreted, perhaps either wilfully or otherwise. That is something that we could stamp out. Perhaps you can both give some consideration to that, and if you want to give us any ideas in writing, we would be very happy.

Q191 **Julian Sturdy:** I want to give Lesley and Kate a little bit of a rest here and come to Camden Market and Ceri, if I can. In our previous evidence, we had BBC London News in front of us. They did the investigation. They found that real fur was being sold as fake fur on Camden Market. You have obviously, I hope, done some investigations of your own on that. Do you just want to outline how that has gone and maybe how widespread the practice, you feel, is at Camden Market?

Ceri Davies: Yes. To be honest, it was something that we had already started to address prior to the BBC report.

Q192 **Julian Sturdy:** You had already spotted it before.

Ceri Davies: Basically, we were looking at the policy that we were going to put in place across the market. This is not just about selling real versus fake fur, but also counterfeit products. We had already internally



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agreed what our strategy was going to be. We were in the process of rolling out to the tenants that we were putting a ban on the sale of fur in the market as of 1 March.

Q193 Julian Sturdy: Can I just come in there? Are you saying that, actually, you admitted there was mis-selling already taking place before the BBC investigation?

Ceri Davies: What we had looked at was being socially responsible around selling genuine fur; we did not want to be known for selling real fur in the market. Also, over the last year or so we have been putting out tenant handbooks, in terms of, "These are the policies and procedures that we adhere to within the market". Our team will go out into the market, meet with the tenants and, while they are walking through the market, actually challenge the tenants on whether the product is genuine or not. We work quite closely with trading standards in Camden to try to stamp some of this out.

Unfortunately, the situation arose where the BBC went into one of the shops and found that. Personally, I went into one of the shops that was highlighted and spoke to the owner and got him to go back to challenge his supplier on it. One of the challenges that we are trying to overcome as a business—and this is not just related to this—is, in general, changing the behaviours of, maybe, historical things that have happened within the market, in terms of trading practices and how people operate. It is an ongoing process because it takes time to change people's behaviours and to educate them in terms of correct retail practices.

What we have encountered with some of the tenants is that they, shall we say, purchase the product that they have at the highest margin, and therefore the quality of the product is not necessarily the finest. It is about us as a team going back and reinforcing that that is not acceptable. It is not acceptable to be coming below these standards, and, as a business, we do not tolerate it. What we have done, not specifically related to this matter but with other products in the market that we felt are substandard, is we have actually asked them to leave the market. We do not feel it is the right partner for us to take the business forwards.

Q194 Julian Sturdy: Could I just take you back to what you said a bit earlier about the ethical values and the fact that you are working to put in a policy of not selling fur, full stop? The investigation was not about that, was it?

Ceri Davies: No.

Q195 Julian Sturdy: The investigation was about the mis-selling and the fact that those people thought they were actually selling a product that was fake fur that was not fake fur and was real fur. This is about the mis-selling and the misinformation that is coming out there and that the consumers are being misled during this process.



Ceri Davies: What the other guys said as well is that some of it is the supplier, but, also, we know that some of it is maybe we may have one or two unscrupulous tenants who have put the incorrect labelling on it. If we find those instances, then we do take action against them. We just do not find it acceptable as something we want to have in our business.

Q196 **Julian Sturdy:** To be fair to the traders—and maybe other members of the Committee will correct me on this—I think the BBC reporter made quite clear, actually, that he believed that all the traders he spoke to—

Ceri Davies: They genuinely believed that was fake fur, yes.

Julian Sturdy: They genuinely believed that it was fake fur. In their mind, they were not mis-selling. It was about going back down the supply chain.

Sandy Martin: To be fair, Chair, if I may, what he actually said was, “I am not so cynical as to say that they all acted in bad faith”. He did not say that he thought they all acted in good faith. It would be rather extraordinary if every single person selling real fur thought that they were selling fake fur.

Q197 **Chair:** Can I add to that? Sorry, Julian. It must be quite a difficult situation for you, because how much control do you really have over those sort of market traders within Camden Market? I can understand you can have an overall policy, but I imagine, by their very nature, they are very independently minded people, one way or the other. Are you confident that they will take notice of the edict from you, or will some of them perhaps still think they can slip it through the system?

Ceri Davies: There is still an element of, as you said, they try to slip it through the system. There is also an education piece that we are trying to put in place. As a landlord, we take quite a proactive approach in supporting their businesses, because, ultimately, we see it as a partnership. If they become more successful, then we become more successful as a landlord, which allows us to, in effect, invest a lot more into the market. It is a bit of a rolling cycle in terms of how we can actually do that.

Going back to the point you just mentioned there, certainly one of the tenants that I spoke to, who had been perceived to be selling real fur as fake fur, is a social enterprise business, and he was absolutely stunned—he was shocked. He went back to his supplier and challenged it, and asked them to provide evidence that it was fake fur, because he was so upset about the fact that he had been called out on the news report. Subsequently, he had us go in there to ask him about it. Certainly he just found it shocking.

Q198 **Julian Sturdy:** Moving on to your announcement that you are going to ban fur being sold, that is easy to say. As the Chairman said, that is very easy to say but much harder, as we have heard already, to enforce. Given the marketplace that you are selling in as well, or that your tenants



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are selling in, that is probably even harder to enforce for Camden Market. How are you going to do that? How are you going to deliver on your promise?

Ceri Davies: I have a really strong team working on the ground. Their roles are to engage with tenants on a day-to-day basis. It is physically being out there, walking around, discussing with the tenants, helping them run their businesses and changing that behaviour that they have, and making it clear in terms of what they can and cannot do. It is the same for me. I very much lead from the front in terms of going out into the market and discussing with the tenants. If I am spotting something, or if one of my team are spotting something, it is being upfront and honest with the tenants. It is saying, "This is not acceptable". This is not just about that.

Q199 **Julian Sturdy:** Sorry to interrupt again. Are your team being trained in how to spot real fur instead of fake fur?

Ceri Davies: In terms of actually going out and seeing it is the real fur, they are going out and just doing a touch and feel and testing.

Q200 **Julian Sturdy:** Have they been trained on that?

Ceri Davies: That is going to be the next thing for us: to actually give them the proper training on it.

Q201 **Julian Sturdy:** You have not done that yet.

Ceri Davies: They have not done that yet, no.

Q202 **Julian Sturdy:** When are you going to do that?

Ceri Davies: In the near future.

Julian Sturdy: We have heard "near future" many times.

Chair: Yes. We get Ministers here saying that.

Q203 **Julian Sturdy:** We get that from politicians all the time. Can you give us some specific timescales? I think it is fair that the Committee has some specific timescales, and also the wider public.

Ceri Davies: What I am going to look to do with my team is to get them trained on it in the next 60 days.

Q204 **Chair:** That is still two months. Perhaps a little more urgency might be quite useful. Can I just follow on from Julian? I think, in the market, you are going to continue to have a problem. The point that I made earlier in the session is that, unfortunately, this real fur in China is now being traded at such a low price, so they can feed it into the system. If you are a Chinese manufacturer, if you see something that looks good, they are not going to worry about the animal welfare implications. They are just going to bung it into the product, and they are going to send it over here. Not all your traders—there will be different ends of the market—but some



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will be very much at the cost-effective end of the market. That is where a lot of this real fur is going to land up if you are not careful. It is really important. Do you take that on board?

Ceri Davies: Absolutely. Because we sell such a broad range of products, certainly when it comes to fake fur, we know exactly who the tenants who sell maybe the hats with fake fur are. We know specifically who the tenants are that we need to be reviewing on an ongoing basis. I have about 800 tenants across the market. It is not the case that I have 800 tenants selling fake fur. Actually, I probably have 10, in essence. I know that those are the 10 tenants that I need to be focusing on to make sure that they are adhering to what they need to do.

Q205 **Chair:** You must know which particular ones you probably need to keep an eye on.

Ceri Davies: I do, yes.

Q206 **Chair:** Yes. That is probably necessary. I just want to say a little bit—this is a different angle to the question, really. Do you have people that sell vintage fur in the market? How is that affected, then?

Ceri Davies: We did have.

Q207 **Chair:** And is it indeed vintage, of course?

Ceri Davies: We have quite a large selection of vintage retailers within the market. Two in particular were selling real fur. For one of them their primary business was real fur. We have actually asked them to stop selling it.

Q208 **Chair:** Right, okay. You have a policy now in Camden Market not to sell fur at all, be it vintage or otherwise.

Ceri Davies: Yes. That is right, yes.

Q209 **Chair:** To Amazon and Camden Market, following the publicity surrounding the sale of real fur as fake fur, what discussions have you had with trading standards? That will lead us into bringing Nicola in on trading standards. What discussions have you had?

Ceri Davies: I will be honest, with regards to fake fur, it is not a conversation I have had with trading standards. I have discussed with a gentleman called Robert Courtney, who is our trading standards officer, about other things in the market. We have taken quite a lot of feedback that he has given us in the past and we have put that in place in the market. Specifically on this, it is not a discussion I have had with him as yet.

Q210 **Chair:** It must be quite a difficult situation for you, managing the market, where you have a lot of traders. They have to have a certain confidence in you. Of course also, in order to make sure the public are certain they are buying what they think they are buying, there must be a time where, surely, you do need to involve trading standards. Do you not think



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perhaps you should have moved a bit quicker towards bringing in trading standards?

Ceri Davies: In this situation, in hindsight, yes. In the past, when we have worked with trading standards, it is something that we have worked quite quickly with them on and escalated where there has been sale of, say, counterfeit T-shirts and licensed products within the market. Yes, I will put my hands up and say this is something that we should have done, specifically related to the tenants that were called out.

Q211 **Chair:** As far as Amazon and Not on the High Street are concerned, how many times would a trader—a company that is trading through you—have to sell real fur instead of fake fur before you contacted trading standards? You seem to be averse to doing that. There is no point in having rules—there is no point in having labels—if they are not fulfilled. Is there any time that you would ever consider calling in trading standards?

Lesley Smith: I am sure there is. We have several primary authorities. Because we are selling to customers all over the country, we used to have a relationship with Slough trading standards when our head office was based there. Since we moved our head office to London, we have specialist trading standards primary relationships. We have a relationship with Hertfordshire, which is a generic product one. We have one with Newham, which is, I think, food. We have one somewhere else that is health and safety, so they are specialists who lead in that area. They will be a receiving point for any other trading standards authority, because it just makes it easier for trading standards authorities to have a way in. It also makes it easier for them to identify any trends in products and companies.

They have not raised this with us. I take the point that maybe we should raise it with them. I did look back and see if this had been raised by trading standards, and it has not. Our starting point is if it is a seller who is selling 1,000 different items and they have two items that have turned out to be fake fur, and they have made a mistake, then the first thing for us to do is to say, "You made a mistake. You have to put this right".

Q212 **Chair:** Sorry to interrupt you. You are not really answering the question. I have said this to you before. It is not a case of a one-off situation. We all accept that mistakes are made, but there seems to be a number of suppliers who have made a number of mistakes and continue to make those mistakes. That is the situation. I am trying to get to grips with—and you have not answered the question—the stage at which you would consider calling in trading standards. Neither you nor Not on the High Street have answered the question of whether you would ever call in trading standards.

Lesley Smith: I do not know the threshold. I am happy to find that out and say, "How many offences is one that you would think is worth



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notifying?" In most cases we have sanctions, and if sellers breach our policies on several occasions—

Q213 **Chair:** Once, twice, three times, four times, half a dozen times, 20 times? How many times would they have to break your rules before you think they should be put across to trading standards? Perhaps they can break your rules as many times as they like. It is no good coming here when you clearly have a problem and not actually telling us if you were ever prepared to bring in trading standards.

Lesley Smith: We are absolutely prepared to bring in trading standards. I am sorry that I do not know the exact threshold for that. I can find that out.

Q214 **Chair:** But is there a policy of when you call in trading standards? Is it down to the discretion of the managers who are supervising it? As a company, you are a very large company; so is Not on the High Street. Is there a policy?

Lesley Smith: We monitor customer complaints all the time. Our primary means of checking that people are compliant in the first instance is customer complaints. Even if you buy things from a seller who is not us, you have an A-to-z Guarantee. If you have something that is not compliant with what you require, you can return that product and we will sort it out with your seller. That is the way we detect it. The honest truth is that, in this particular case, HSI detected more than our customers have. We did not have this raised by customers. We had single-digit numbers of customer complaints about this over a long period. It is not something that had surfaced for a discussion; it has now.

Q215 **Chair:** If a company carries on trading real fur instead of fake fur, do you not think that the customers that deal with you would actually expect you to refer that to trading standards in order to protect them? That company might be doing this either through knowingly mis-selling or unknowingly mis-selling, but—

Lesley Smith: Chair, all I am saying is that I am sorry. I do not know that threshold.

Q216 **Chair:** I would like to require from both of you something in writing as to what your policy is, if you actually have a policy—as to which stage trading standards is brought in. It is a very legitimate question. Kate, I do not know whether you want to answer.

Kate Burns: We do not have a policy, and I can confirm that. In the past we have relied on the sanction of removing a partner from our site, because that removes their livelihood. Having heard this discussion, I will go away and look at what policy we should be putting in place.

Chair: It is just another pressure on those who are supplying to comply with the rules. That is something very positive that could come out of



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this inquiry.

Q217 **Sandy Martin:** Can I just touch very briefly on the questions you were asking? Ms Smith, you said your primary source of information is your customers in respect of safety and trading standards issues.

Lesley Smith: I did not say in respect of safety.

Q218 **Sandy Martin:** You did not say in respect of safety, but it is part and parcel of the same issue, is it not? Whether you are selling something yourself or on behalf of somebody else, if there is any suspicion about what is being sold, or if there is any way of checking whether what is being sold is not actually what people expect they are buying, you need to take that action before customers complain.

Lesley Smith: I completely agree. I was not saying that one is a substitute for another. I was saying that we are a very big site, as you will be aware. We have many customers. Customers contact us very regularly about good things and about bad things, and we follow those up and we investigate those. It is an important indicator. Probably our most important indicator is what our customers think.

This is something that just genuinely has not come up. That is not me saying, "Therefore, we will not investigate it". That is me saying that this red light did not light in that particular case, but it is absolutely something we would raise. Trading standards raise things that have not come through customers and things that have. We have very regular engagement with trading standards. It is certainly useful for us; I hope it is useful as a method of escalating things for them and for solving problems. Like Not on the High Street, our primary sanction on sellers is, if they are breaching our policies, we take them down. That may or may not require further engagement with trading standards.

Q219 **Sandy Martin:** Ms Tudor, have you, in your trading standards department, had any requests from anybody to look into this issue at all?

Nicola Tudor: We have from the Humane Society. If I can explain, trading standards is local government-delivered apart from in Northern Ireland, so there are about 200 trading standards departments for the rest—

Sandy Martin: Yes, so in your department.

Nicola Tudor: Exactly. It is a very mixed picture. In London we have a fair-trading group, which I chair, to try to link up those tiny departments a little bit and to spread what information and so on that we can.

At the back end of November, the Humane Society asked whether they could perhaps come to one of our meetings and give us some training, which was, I am afraid, the first time that this particular issue of fake faux fur had really come across my consciousness. Somebody did come along and present to that meeting. It was really incredibly useful. They brought in samples of some of the goods they had test-purchased, so



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that we could have that experience of feeling things and trying to make out the difference. That then rather prompted more activity than there had been before that, not necessarily from consumer complaints but because that had made us realise that there was an issue. If people did know they were buying fur, they might mind, especially if they had thought they were buying fake fur.

There has been quite a lot of proactive work done since then. Specifically for Tower Hamlets, we have not had any requests from members of the public; it has all been from HSI. We still, obviously, wanted to take that on.

The HSI has also come to me sometimes when there have been press releases for London or the UK as a whole, again so that I can feed that out to my network, just to keep that awareness up. When the BBC London report happened, I did not see it; I was not aware of it. Again, somebody from HSI did tell me about it and send me a very short link to a clip of a couple of minutes. They said it had named three of the London boroughs. At that stage, they did not actually say that it also mentioned mine, so I did not find that out until a couple of weeks later. They suggested that perhaps it would be helpful for those particular boroughs to be alerted, so I did then contact them so that they would be aware of that and, again, could then do what follow-up they wanted to. Yes, we had no consumer complaints but, as I say, HSI has alerted us to it.

Q220 Sandy Martin: Was there a call from either the specific retailers or indeed the markets, such as the three markets we have seen represented here—online markets and physical markets?

Nicola Tudor: No. HSI is based in Hackney. When they find non-compliant product or things they are concerned about, they do sometimes tell me, but they do also quite often contact Hackney trading standards, who have then been playing quite a role in brokering engagement with other trading standards to make sure those authorities know what is happening and, again, they can take what action they have the resources for and see fit to take.

Even though Hackney cannot act directly, because it is not a problem for them in their area—these are not their traders—especially if it is something where it is more than a one-off, if it is a repeat, they are quite keen to see what further steps can be taken to prevent future non-compliance, to make diligence better in future and to keep those conversations going.

Q221 Sandy Martin: If you were contacted by a retailer or a market in your borough and asked to investigate, you would have the resources and the willingness to do so.

Nicola Tudor: Resources is tricky. Trading standards across the piece has lost about 50% of its staff in the last 10 years, and the numbers are still declining. There are still boroughs that are being cut now and others



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that expect to be in the near future. Resources is always interesting. However, we would still do our level best to act. In fact, in my own authority I have just written, through our markets office, to all of the council market traders to remind them of this. It is not that we have had complaints about them, but it is just to remind them broadly about the need for textile labelling—because if the label is not there or is inaccurate in the first place, obviously it is a disaster—and also specifically about real fur being sold as fake, and that they do need to be aware of that, even though we have not had the complaints yet.

A couple of years ago, HSI did complain to us about some inadequately labelled real fur. There were a lot of visits done then and, again, some written advice was given to specific traders. Again, there was broad-brush writing to specific markets to get it out to everybody concerned, but also specific identified people were visited and were given more detailed one-to-one advice at that time.

Sandy Martin: Given what we have heard from the three markets we have been speaking to, with the conversations they have been having with their sellers and the advice they have been giving them and so on, one would expect that, if they actually came to trading standards and said, “We have a problem with this particular seller”, the likelihood is that that would be a seller who is deliberately engaging in the sale of something that is labelled as other than what it is. The point I am making is that they have already gone through various other processes. Would you move directly to prosecution or would you want to issue yet more warnings?

Nicola Tudor: It would be really dependent on the circumstances. We would need to look at that. We do have to abide by the regulator’s code, which is very much about encouraging compliance as a first option rather than rushing to prosecution, particularly for something like mislabelling rather than somebody doing things deliberately. That would generally be the route people would take. Labelling can be corrected. You say, “You have to take that off sale. You need to get back to your supplier. You need to make sure that it is accurately labelled”, and take it from there. If there was evidence that somebody had knowingly misled somebody, then a different view would be taken there. You would need to look at everything very individually.

Q222 **Chair:** Has anybody across the country been prosecuted at all by trading standards? At the moment, there does not seem to be any sort of deterrent, does there? There will be people out there who know exactly what they are selling. It is probably difficult to prove that they know that, but the trouble is that there does not seem to be any sort of deterrent. That is what worries us.

Nicola Tudor: I do not think there have been any prosecutions. There has been quite a bit of work done, though. For instance, to be not so London-centric, Windsor and Maidenhead has a slightly sideways alert. It was through a completely different section of the council. Somebody had



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complained to the council that a trader in Windsor was selling real fur, and the complainant objected to that on moral grounds. It was not that it was mislabelled; the trader was perfectly upfront about it being fur, but the complainant thought that the council should not be allowing it.

It turned out that the particular trader was operating under a pedlar's licence rather than a council licence, so it actually was not within the gift of the authority anyway, but trading standards, being told about this rather circuitously, thought they would go and see and make sure everything from a trading standards point of view was fine. The labelling was not compliant. It was not compliant with article 12. This is the thing about bobble hats. Even though he was saying, "It is fur", it was not strictly compliant. Nobody was misled, but they said, "Actually, you cannot sell these until the labelling has been corrected". He then did withdraw from the marketplace. He said, "Well, everybody is at it", which seemed to be a fair point. A lot of people were.

Q223 Chair: Therefore, is the law strong enough? Is the labelling strong enough? What is the issue?

Nicola Tudor: They then decided that they would do a little sweep of traders, both markets and shops, selling that type of product. Most of what they found was actually fake fur. There were some labelling issues that they then dealt with, but again that was mostly by advice and follow-up letters and so on. There was not a problem with fur.

They found a couple of retailers who were selling fur. It was disclosed. It was not compliant with article 12. Ironically, they actually did not have the article 12 wording, but they did declare the species. My understanding is that the fibre content was correct, but instead of saying, "Parts of animal origin", it said, "Rabbit", or whatever it was. Trading standards said, "Well, actually, it is great that nobody is being misled. However, this is not compliant with the labelling regulations. Therefore, it is an offence. Therefore, you need to not sell these until that has been corrected".

They also followed that up with their suppliers. They all had traceability for where they had got those products from, and Windsor and Maidenhead wrote to the suppliers to remind them of their responsibilities to make sure that things were labelled accurately and in compliance with the regulation. They copied that to the trading standards departments where those suppliers were based to ensure that trading standards would know what advice had been given. That is important because you have then asked questions of the retailers about how many times you will warn people. If somebody does something wrong one time, it is appropriate to give them advice. If they keep on doing it, you might want to take some other steps.

Individually, back to Tower Hamlets, I am waiting with interest for more from the BBC, because you may remember that they came to a



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wholesaler in Tower Hamlets. I know that, in the past, advice has been given to wholesalers.

Lesley Smith: Chair, I have just checked my notes. We did have one contact from trading standards in the last year.

Chair: You made one contact with trading standards.

Lesley Smith: We had one contact on this subject. We had lots of contacts. It was a product that was non-compliant, and it was removed straightaway.

Chair: What I am particularly interested in from both of you is whether you have any policy on when or if you contact trading standards.

Lesley Smith: We can come back to you on that.

Chair: We would be very happy to take that in writing.

Q224 **Julian Sturdy:** I just want to get back to the key issue here, which is about real fur being sold as fake fur. Nicola, you talked about how you have had no consumer complaints. This is something we need to really drill down on. It does not surprise me that you are not getting any consumer complaints, because it is very difficult for the consumers to understand whether they have bought fake fur or real fur. If they think they have bought fake fur, they believe that. It is very difficult for those consumers to identify between the two. It would be very difficult for any of us on this Committee to identify the difference between the two if we were given it.

What I really want to drill down on is this: how proactive are you, as trading standards, in trying to stamp this out, especially regarding patrolling the online sites? I would like to understand how that works within trading standards. Obviously, I understand that trading standards organisations lie within local authorities. If it is a market site or something like that, it would be up to that particular local authority to act. What are you doing about only-online sites? How proactive are you being?

Nicola Tudor: Again, with online it will very often fall to the authority where that online seller is based. As has been said, with Amazon they have a primary authority relationship for fair-trading matters with Hertfordshire. If I had a complaint that related to Amazon, I would be putting that through to Hertfordshire trading standards in the first instance for them to deal with.

Q225 **Julian Sturdy:** What about the proactive side of it? You have said you have had no consumer complaints. To repeat, it is going to be difficult for consumers to complain about this. What about the proactive side of it? Obviously, you now know it is an issue. It has been raised; it is in the public domain. How are you, as trading standards, going to proactively police that?



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Nicola Tudor: For trading standards across the piece, it is going to vary hugely. We had another fair-trading meeting last month, and I did ask my colleagues whether any of them had done any work on fur, and it varied hugely. Some people had gone out and done a lot of visits. They have probably not done so much online, though, as I say, Hackney are tackling a lot of complaints from HSI about online sellers. They are then fielding those out to the relevant trading standards departments. None of them have been based in Hackney; I do not think any of them have been based in London, in truth. I do not fully know the answer to that.

Julian Sturdy: We need to know the answer to that. We do need to know the answer to that as a Committee.

Q226 **Chair:** We do. If I bought something online that I find out to be real fur when it is supposed to be fake fur, how could I contact you? I do not mean you personally, but trading standards. There seems to be a mismatch here on how people are able to complain and get this put right. We have to stop it happening.

Nicola Tudor: For several years now, most contacts with trading standards have gone via the consumer service. It is now run by Citizens Advice. This is the Citizens Advice consumer service, which has a national number; people can contact that. The Citizens Advice adviser will then make a determination as to what they think the problem is, and give the advice to that consumer so they can take whatever action is appropriate for them as an individual, but that information is also passed to, probably, at least two trading standards departments. It goes in the direction of where the trader is based, provided that you have at least the name of the seller, and also to where the consumer is based. Both of those authorities will get that information. If that then reveals to trading standards a problem with a trader, with a market sector or perhaps with criminality that Citizens Advice has not thought about themselves, we pick it up and we can then take action from that.

Again, I absolutely agree: if you do not know there is a problem, how are you going to report it? But I did check the Citizens Advice database for England, Scotland and Wales from 1 April 2016 to see how many complaints there had been from members of the public about this issue. There were two. In slightly over two years, there have been two.

Q227 **Chair:** There have been two across the whole country.

Nicola Tudor: There have been two across the whole country.

Q228 **Julian Sturdy:** That highlights the problem that it is very difficult for—

Nicola Tudor: It absolutely does highlight the issue. One was somebody who had seen, again, this issue with bobble hats. They thought the hats were genuine fur, and they wanted to report that. The other was actually somebody who perhaps took the issue that you have with the labelling requirements. They had seen products for sale in unspecified locations that were declared as fur but had that article 12 wording. They were



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saying, "Surely there should be more about species, country of origin and so on".

Q229 **Julian Sturdy:** But that is not really what we are talking about.

Nicola Tudor: No, indeed. Those were the two reports that were made via the consumer service. Some people will manage to find their way directly to trading standards and complain directly, so there have been a few others. For all those I know about, trading standards have looked into them. Sometimes they have been incorrect, i.e. people thinking maybe it was real fur when it was not. But they have always followed them up.

Q230 **Julian Sturdy:** What you have highlighted there shows that trading standards need to be much more proactive on this issue, rather than reactive. If you are just going to wait for consumers to come to you, they are not going to come to you, because they are not going to know whether they are buying fake fur or real fur. It is very difficult, as I said, for them to identify that. Given what we have heard, the evidence that has come forward and the issue that has been highlighted, surely that means trading standards have to be much more proactive on this issue?

Nicola Tudor: I have two opposing answers to that. First, particularly since our December meeting when we had the presentation from HSI, some of my colleagues have been very proactive. They have been going out and doing inspections, giving advice and taking action, including following things through the chain. This is not just going to the market stall or whatever, but saying, "Where did you get the product from?" and tracing that through to make sure the wholesalers and so on are labelling and describing things correctly.

On the other side of that, though, some authorities are very tiny. If you have two members of staff and roughly 200 bits of legislation that you are meant to be enforcing, then other things are very often more important, particularly locally. If you have no complaints about textile labelling, fur or otherwise, and you do have complaints about rogue builders taking the life savings of elderly people, or if you have a spate of knife attacks that are linked with under-age purchases, or problems with corrosive substances or rogue landlords and lettings agencies, those things are going to be higher up your very stretched resources.

Q231 **Chair:** We understand that, but the interesting point you made is that the general public seem to go through Citizens Advice and then they come to you. One of the good parts of having an inquiry is to bring out into the open what the public can do. Are the public able to go directly to you as trading standards? If they buy something, online or wherever, that they think might well be real fur instead of fake fur, can they go directly to you? I understand resource issues and I understand priorities, but what we are finding here is that, as Julian said, there does not seem to be enough proactive work.



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Nicola Tudor: For the most part now, calls do go via Citizens Advice. As I say, the detail automatically gets passed on to trading standards.

Q232 **Chair:** You have not answered my question. Can the general public go directly to you, trading standards?

Nicola Tudor: Generally, no. As I say, it is a local authority service. Different authorities do things in different ways.

Q233 **Chair:** Is that not a weakness in the system?

Nicola Tudor: Personally, I far preferred it when trading standards was directly accessible by the public, but that was a decision that was taken a long time ago. Funding was given first to Consumer Direct and then to Citizens Advice to run a national consumer service.

Q234 **Chair:** In the evidence we have had this morning, we have had retailers in the room that have not referred cases to you, or only one in the case of Amazon. The public cannot directly get to you. I am wondering whether you need to review your processes if trading standards is going to have any sort of teeth and if traders are going to feel that there might be a possibility of them being prosecuted. As far as I can see at the moment, it looks like you can carry on with impunity, basically. You might be stopped from trading a certain product, but nobody seems to be bringing anybody to book on the issue, do they?

Nicola Tudor: As I say, there has been work done engaging with traders, retailers and wholesalers. That is an ongoing process. It is not that people are just saying, "I have sent a letter and that is the end of it", but it is true that there have not been any prosecutions as yet. That does not mean there will not be any; it means there have not been any as yet.

In terms of directly contacting trading standards, I personally thought it was better when people could contact all services directly. That is really a funding issue. The change originally happened to try to level things up. That was the justification given at the time: that if there was a national service, people could have some advice, but the data would always be passed on to trading standards as well.

Chair: Time is pressing, and we have our second panel. There is one final thing I would like to say to you, though. If you have any ideas on a labelling system that could be brought in after we leave the EU, that would make the situation much clearer between what is fake fur and what is real fur, it would be really useful. At the moment, the labelling is somewhat misleading. Thank you all very much for your evidence this morning. Thank you.

Examination of Witnesses

Witnesses: Mette Lykke Nielsen, Michael Moser and Mark Oaten.



Q235 **Chair:** Please would you like to introduce yourselves? We will carry on with our evidence session. Thank you all for coming this morning.

Michael Moser: I am Michael Moser. I am the chief executive of the British Fur Trade Association. As the name suggests, as a trade association we have members in the supply chain who range from small, young entrepreneurs, designers who have graduated recently, manufacturers, furriers and some international fur brokers.

Mette Lykke Nielsen: My name is Mette Lykke Nielsen. I am the chief executive of Fur Europe, which is the European fur trade and fur farming association. We are also the initiator of the Welfur programme.

Mark Oaten: My name is Mark Oaten. I am the chief executive of the International Fur Federation, and we represent fur in 50 countries around the globe. Indeed, our partners in Europe are Fur Europe, and our member in the UK is the British Fur Trade Association.

Q236 **Chair:** We very much appreciate you coming here this morning. Naturally, the issue in many ways with this inquiry is real fur being traded as fake fur, but it is interesting to bring you in here to talk about the fur trade itself. My first question is this: according to a YouGov poll carried out in February this year, 69% of the British public were supportive of a ban on the import and sale of all animal fur in the UK. However, imports of fur to the UK have been increasing. Can you explain why this is and what fur is particularly being used?

Michael Moser: Opinion polls can be flawed somewhat. In my view there are some people who undoubtedly are very much against fur, as an ideology, but the majority of people express concerns over animal welfare, and that is based largely on perception. A lot of the reports that are given out are fed by animal rights organisations, which show animals that are distressed. I can say categorically that they are not representative. They are distressing to me—I love animals—but I do not find it inconsistent to work in the fur trade, eat meat and indeed to farm animals.

The metrics actually show that fur is increasing in popularity. An economic report published by the University of Copenhagen showed that fur sales grew by 350% to the year 2016, with a value of £162 million. The BFTA membership is growing. We are seeing the confidence of fur retailers, expressed in Canada Goose choosing London as their first European flagship store. Department stores such as Harrods and Harvey Nichols are doing extremely well. We are also seeing fur being sold—this is a real testament to its popularity—in fashion outlets and independent fashion boutiques outside of the major conurbations, in small towns. We are seeing fur sold in lifestyle shops. We are seeing fur designs now being extended to items that appeal to much younger people. We are seeing fur used in accessories and menswear. It is popular with younger people, who are making the choice. There are also a number of people



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who are choosing fur because, in their view, it is a more ethical choice based on environmental grounds. For us, it is very much about personal choice.

Q237 Chair: As far as importing fur is concerned, there are European regulations on the fur farms within Europe. We will probably talk a bit more about that. We are actually going to Denmark with the Committee to look at that. Would it be fair to say that fur farming conditions in some parts of China are questionable, to say the least? What checks do you do, as the British Fur Trade Association, as to where those imports are coming from and under what welfare conditions that fur was reared, basically?

Michael Moser: If I may, after I have answered that I will defer to Mark, who is chief executive of the international group. On a personal basis, I have actually visited fur farms on five continents. In a previous role, working with the International Fur Federation, I was the director of standards, and I actually worked with Government representatives in China to raise their welfare regulations to European standards. I am absolutely comfortable that the welfare regulations in the vast majority of Chinese farms are very good. Of course, I cannot answer for every single firm, but as far as we are concerned, the development of the welfare certification programme in Europe and the equivalent certification programmes in North America will clearly demonstrate the high standards, and that will give assurance to the consumers.

Q238 Chair: You say you think the standards in China are okay. But when you are getting the fur now actually being traded in China at a price that is probably lower than the cost of producing fake fur, can you actually look me straight in the eye and say that you think those animals are being treated properly through the system, whether you agree with fur farming or not? Surely when prices drop there is a huge pressure on those fur farms to cut their costs. When you cut your costs, you very often affect the welfare standards. These things do not quite fit with me. How would you answer that question?

Michael Moser: I would say it is economically impossible to produce real fur cheaper than synthetic materials. If you think for a moment on the bulk weight of viscose, nylon and the acrylics, and the way they are produced, it is simply impossible. I would really like to make that point very firmly.

Undoubtedly, fur is cheaper to produce in China because their cost base is lower. The statistics show that the majority of Chinese-produced fur stays within China. Certainly, we believe that as little as 9% of fur products being imported into the UK have come from China. Some of that may also have contained fur from Europe or from North America, but even in the one scenario that all of that was Chinese fur, it is as little as 9%.

Q239 Chair: You must accept that, as the price drops in China, it is likely to



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bring about a situation where the welfare standards will also drop. To what extent are you certain about this? China is a very big country. I have had a lot to do with animal welfare issues in China, bear bile farming among others. I am yet to be convinced that there is proper inspection across China. You can assure me that you believe that is happening.

Michael Moser: I can say very much that I do not believe that welfare is sacrificed when prices go down. That may be the perception, but that is not true in reality. From my own experience, I know the vast majority of Chinese fur is produced by a number of large producers. I have been to some of those farms, and their welfare conditions are excellent. If I may, Chair, on that point I would defer to Mark, who can maybe give an international view on this.

Mark Oaten: Just on the issue of China itself, there are perhaps two points I would want to make. I was listening to the evidence session earlier on, and it is difficult to understand where these items are coming from. You made a comment that it must be coming from China. I wish it was as simple as that, but my sense is that we do not absolutely know that they are coming from China. They are coming from what we believe to be a scrap industry. That means the fur could be coming from all sorts of different countries. Maybe later on we can explore that issue. It is not necessarily the case that they are coming from China. I want to put that point there.

If, however, it is an issue about China, I visit a lot of farms and I work with the Government in China—the State Forestry Administration—who have responsibility for farming there. They absolutely have the standard in place. They are putting in place the standards that link in to the Council of Europe. However, you are correct when you mention the inspection. My reservation is not about the standards; it is not about the commitment of the Chinese Government. In such a vast country, it is about being able to get the same level of inspection regime that we have in other countries. On that point, I would agree with you: there is work that needs to be done there.

Q240 **Chair:** We will probably drill down later on exactly where we think some of this fur might be coming from. Mette, would you like to answer this question, please?

Mette Lykke Nielsen: I represent the European farmers, and I can explain how our certification system works there, but I agree with Mark. They have standards in place that are good, but it is the enforcement that triggers the question.

Q241 **Dr Johnson:** We have heard about consumers not being sure about what they are getting. The trading standards people say they have only received two complaints. But it has seemed relatively easy for reporters to find examples when they have gone to look, which suggests that it is very difficult for consumers to be able to identify what they are getting.



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Why is it so easy to pass off real fur as fake fur to consumers?

Michael Moser: I must say that we are greatly disappointed by these products. They are outside of our production; they are nothing directly to do with our industry. We are very deeply unhappy that these issues are coming to the fore. Certainly the products and garments that we represent are all correctly labelled.

This is probably related to some of the issues that have been highlighted already. That is the different marketplaces and the people selling therein. We have heard about the online retailers. I must say that it is not only the online retailers that you have spoken with. Some of our members also sell online, and that is a very rapidly growing area, but they will be correctly labelled. We have heard about some of the difficulties with third-party sales.

Regarding the market stalls, the issue there may be one mostly of ignorance of the product. We have a difference here between mis-selling, which is accidental, and intention to deceive. I do not know how the issues divide between the two of these. My instinct is that the majority of people are not really aware of what they are selling. The markets mostly sell vintage, or they sell these cheap products. You will rarely find a medium-to-high value fur product being sold in a market.

You have a problem, then, with vintage. Do the retailers or market-holders know exactly what they are selling? Maybe not. That is no excuse. They should be aware. Everybody is entitled to make informed buying decisions, and it is absolutely right that we highlight the responsibility primarily on the retailer, whoever they may be, to accept that. If they feel they do not have enough product information, again it is their responsibility to make sure that they do.

We have also found that there are some issues with supply chain management. It is not for me to drill down there, but you have heard from various speakers that they need to tighten that, and that is absolutely correct.

In terms of enforcement, there is a problem we have found with trading standards. I must say that I am very sympathetic to their problem; it is another burden for them to have to fulfil. In their instance, as well as resources, they have a problem with skill levels. As we have seen, sometimes it is very difficult to distinguish between real and fake fur. Indeed, trading standards would not necessarily have that skill, which is why we have made an offer to work with them as much as we can to help upskill this.

I have worked with trading standards in the past. In fact, it is interesting that only two reports were made to trading standards. I suspect that they were two inquiries that I subsequently received and responded to. One was labelling and one was about selling regulations. Again, we would be more than happy to work with any trading standards. I was



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very interested to hear about the training group mentioned before. Again, I would be delighted to go along and see whether there is any way in which we can help upskill them.

In a nutshell, yes, there are sometimes difficulties in distinguishing, but that should not be a defence. People must be aware of the product they are selling.

Also, in terms of the bobble hats, we now have a distinction here: they contain animal hair, not fur, and there is a difference there. What we have found is that it is not only animal hair in this bobble that is meant to be synthetic; you will find there are also strands of cotton. Correct me if I am wrong, Mark, but there is a whole range of things being found in this.

Mark Oaten: I went to the markets myself to try to purchase these items so that we could do some analysis on what was taking place. Incidentally, I have to say that I was categorically told by market stallholders that I bought from that it was fake when it was real. I was also categorically told that it was the other way round as well, with absolute determination, despite lots of cross-examination from me. We have referred those cases to trading standards, and unfortunately that process is very complicated.

Q242 **Chair:** And very slow, I imagine.

Mark Oaten: I am still waiting for responses. In fact, I was advised that the best way to handle this was actually to report it to DEFRA. In another letter, I was told that they could not make any promises that trading standards would actually make contact with me, so we have concerns about that.

I am sorry; I digress. When we did the analysis on the products that we bought, we found the following in the fake: fur, wool, leather, suede, goat and camel hairs, along with a lot of other chemical issues, which I will not go into. Again, there are some complexities about the make-up of the individual fur, which adds to the complexity for the authorities on this.

Q243 **Dr Johnson:** Presumably, as representatives of the fur industry, you would advocate that real fur was in some way superior to the fake fur. If the consumer cannot tell the difference, how can that be so?

Mark Oaten: I personally would absolutely advocate that natural fur is better than the plastic alternatives; of course I would, yes. I would absolutely want the consumers to be able to make that informed choice. Presumably we will get on to labelling issues later on, but this is something that is of great concern to us. We are absolutely determined to try to help this inquiry achieve that, because for us we want that transparency. If people do not want to buy real fur, that is absolutely fine. I just want them to have the choice to know what they are buying.



Mette Lykke Nielsen: I fully agree.

Q244 **Dr Johnson:** Why is it so difficult to tell the difference? Have they got to the stage now where the fake fur is just so close and realistic that there is no apparent difference here?

Mark Oaten: It is hard for an untrained eye. There are some fakes that are very obviously fake, or at least they are to me and other people. Then there are some fakes where it is very, very hard to spot the difference. We heard earlier on about the various tests, but why would a consumer going into a market anywhere blow at the fur or test it. They would not do those kinds of tests. They would perhaps even feel awkward doing those kinds of tests in front of a retailer, and they certainly cannot do those tests online.

That is why it is really important that we collectively have some form of labelling to help them with that process. It is hard to do as an individual, but, even if you could do it, I am not sure I would go into a shop and start picking up products and blowing and feeling them anyway; I might feel uncomfortable doing that.

Q245 **Sandy Martin:** Chair, almost all of my questions have been asked and answered already. You say you think the primary responsibility is with the retailer rather than with the market, or indeed Amazon or Not on the High Street. Clearly, they are online marketplaces. It is much easier, in many ways, to deal with a marketplace, especially a massive multinational like Amazon, which is rapidly becoming a major part of the entire retail industry in the world. Is there anything that you are willing to do as an industry, as a trade, to work with people like Amazon to enable them to be able them to tell the difference?

Mr Oaten, you have already said yourself that you have a massive vested interest in making sure that people understand the difference between real fur and fake fur. If people want to buy real fur, they need to know they are buying real fur. If people want to buy fake fur, they need to know they are buying fake fur. Are you willing to work with Amazon and people like that in order to achieve that?

Michael Moser: Categorically, yes. Genuinely—and I say this as passionately as I can—I would not want anybody to buy a piece of fur if they truly did not wish to do that. We have enough people wanting to buy real fur. For me, I will do anything I can to help people make that clear distinction. Whether that is with trading standards or Amazon, I am willing to work with anybody to help this.

One of the keys here is trying to help people upskill to make the distinction. Another piece of advice I would give to people is, "If you have doubt, do not buy it. Do not buy the product". What we are talking about here is essentially another form of counterfeiting. In the same way, people should not be hoodwinked, intentionally or otherwise, into buying fake leather, dangerous electrical lights from abroad or indeed counterfeit branded goods—for me, it is very much the same issue here.



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We need to make those who are in charge of enforcement have the skills to identify this.

Mark Oaten: Mr Chairman, we would go further. I listened to Ceri from Camden Market. If he wants to get the training done in 60 days, we will turn up next week with a team of people to train his staff, work through all of that and offer him any assistance we can. We can maybe try to do it before 60 days, because it is important to us.

Q246 **Chair:** As far as trading standards are concerned, you suggested that there would be a way that you could support them in a training programme. Have they taken you up on that?

Michael Moser: I have tried. Unfortunately, as I have found out, it is not centralised. so we would need to make that offer to each and every department. Maybe through this Committee I could make this offer. I am sure there could be some way that we could organise some annual or biannual event. There must be some way to bring together at least a representative from whichever trading standards departments are interested and informing them more about how fur is produced, how it is imported and indeed how to make these distinctions.

Q247 **Chair:** It is very important that this whole inquiry is about making sure people buy what they intend to buy. If they intend to buy fake fur, it must be fake fur; if they intend to buy real fur, it is their decision to do so. You will know that some of this fake fur is quite difficult to tell from real fur and vice versa. This is absolutely clear: it is about mis-selling, and it is about choice. Many consumers do not want to wear fur, and you would accept that. Other consumers do, and we accept that also. We are also worried about the welfare conditions of that fur as well. Anything you can do to help identify what is real fur and what is not would be useful.

Michael Moser: If it is the appropriate time to mention this, Chair, we believe the current labelling regulation is not fit for purpose. Most people would agree with that. I must say in its defence—

Chair: Let me bring Julian in now, because that is actually his question.

Q248 **Julian Sturdy:** Thank you, Chair. When you say the current labelling is not fit for purpose, you probably have hit the nail on the head in a way. I would just go back first. We have to remember that, as the Chair said and as has come out right the way through the inquiry, consumer choice is absolutely paramount in this. People need to buy with confidence. That brings us neatly on to that labelling system. You are saying it is not fit for purpose. I tend to agree with that, from the evidence we have heard. If it is not fit for purpose, how are we going to improve that labelling system? My first question is whether, post Brexit, that gives an opportunity for the UK Government to improve that labelling system. If so, what needs to be done?



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Michael Moser: I have a small degree of sympathy for the regulation, because it was never designed to fulfil this need; it was very much a textile regulation. As a result, what we are seeing is some absurdity in the way it would be applied in this particular instance. That may lead on to some of the problems we have in the marketplace. This is about retailers really not understanding their obligations under the textile labelling Act. That is not going to provide the clarity that consumers are looking for. We do not need to wait for Brexit, if I am correct on this.

We would like to see, first recognised as best practice and eventually being mandatory, a label that clearly states the presence of real fur—for example, “Contains mink fur”, or whatever. That would immediately clearly indicate those products that contain real fur. Equally, we would like to see a label that says, “Contains synthetic fur”, because we see that the distinction is difficult. We concede that. Indeed, if you then mention the fur type, it would give another added layer of information. That could and should maybe be looked at to be introduced as soon as possible.

Q249 **Julian Sturdy:** Can I just interrupt there? You have made two quite clear distinctions. We have already heard—Mark, you mentioned this—that there is a mixture as well. The bobble hats were a classic example where you have animal hair in there as well as synthetics and other things. That potentially presents a grey area, if you distinguish between the two.

Michael Moser: In my view, no, it is not a grey area, because if it contains any amount of fur, it should be labelled. In principle, to take it to the nth degree, if it intentionally even had two strands of fur, it should say that.

Q250 **Chair:** What about the hair? I know I am perhaps splitting hairs, but where are we on that? As Julian said, it is a very grey area.

Michael Moser: If it has intentionally been put in there, there is no reason why that should not be labelled as such. If you like, it is equivalent to a product containing nuts. If it contains any trace of nuts, you simply put a label on there about the possibility. We could do the same with fur. If it has been accidentally or misleadingly put in there, that is another issue we have to look at, which is more to do with supply chain management. As regards labelling, I would propose that any amount of fur, no matter what, is clearly labelled with the type of fur it contains.

Q251 **Julian Sturdy:** Can I ask, as sort of a clarification question, why is it mixed? Is there a reason for the product?

Mark Oaten: We do not make it.

Julian Sturdy: No, I know you do not. I realise that. I am just asking that for clarification.



Chair: It is cheapness, I suppose.

Michael Moser: If you ask me, anecdotally, it could be a genuine pollutant that just happens to be there, but, in all honesty, I think it is an attempt to make the synthetic feel more luxurious. When it is there and it is not meant to be there, some people are setting out to deceive. It absolutely should be clamped down on. Personally speaking, I would like to see those cheap products off the market. That is a personal view. They cause our industry untold damage. It does not reflect our industry's standards or the quality of our product. The way these cheap bobble hats containing mixed items are being sold at the moment is patently not correct.

Mark Oaten: Chair, you asked about the other items. Why this is so important is because there are some people who do not want to buy real fur. There are also—I respect this totally—vegans or some animal activist groups that do not believe we should have leather, wool or camel in these products. You could have a situation where there may be no real fur in the fake, but there are actually other animal products in the fake. Again, that would be misleading for a genuine vegan who just did not want to buy that. We need to tackle that problem as well, engaging perhaps with the wool, leather and other industries.

Chair: That might be partly why the European regulation at the moment is so woolly, if you like, because it perhaps tries to cover too much. Perhaps we need several specific labels in the future. It might be one for fur, and it might be one for other animal products or whatever. We have an opportunity to look at this.

Q252 **Julian Sturdy:** I just want to drill down on the fact that you say we can start with this label-changing or tightening up on the legislation within labelling now. What would be your ask directly to Government or to the Ministers, as we talk?

Michael Moser: We recognise that as best practice. The vast majority, if not all, of the products that our members sell clearly state the fur type, so it can be done. To be fair, these are dedicated fur items. When we go down to these cheap areas, it may be more difficult. I am not interested in the difficulty; it should be done.

Julian Sturdy: We all agree it should be done, but how are we going to do it?

Q253 **Chair:** What do you want to see on the label? Should it say "fur" or "non-fur"? How do you want it to read?

Michael Moser: I would like to make it very clear and very easy for buyers. It should say, "Contains mink fur", "Contains fox fur", or "Contains synthetic fur", so there is that clear distinction. If there is any doubt, then quite frankly it maybe should not be on the market. There should be a nice, clear distinction that it contains natural fur by virtue of the fur type and, if it does not contain fur, by virtue of the fact that it says it is synthetic fur.



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Q254 **Chair:** You want the actual type of fur on there as well.

Michael Moser: It is an added layer of information for consumers. Some people would be interested. I know there are some concerns. For example, we rigidly adhere to CITES, but people may want confirmation that there is no fur from endangered species being used or no illegal fur. That will just add another layer.

Q255 **Julian Sturdy:** Would you put country of origin on, showing where that fur has come from?

Michael Moser: Personally speaking, I do not see that adding the country of origin would necessarily help consumers. The vast majority of consumers would not know the welfare regulations of one country from another. Equally, in the way fur is produced, sometimes they have what is called intersorting, where buyers will go and buy maybe several pelts from different countries, and those may eventually go into a single product.

What is more important to consumers is an assurance that the welfare standards of the fur they are buying are strong. That is what we will be developing with the WelFur and FurMark labels.

Q256 **Chair:** That is probably the point that Julian is making: if it had a country-of-origin label, it might be able to alert consumers to the fact that there is a real welfare problem in that particular country with the rearing of fur.

Mette Lykke Nielsen: If I may, speaking from a European and EU perspective, the EU has the Eurobarometer surveys. If we look into that and what the citizens actually say they would like to see on a label, they clearly say they would like to see the level of animal welfare. This is why country of origin is not really the answer to this question. Whether it is produced in Denmark or Italy does not really matter. Is it produced to the right standards? That is what the consumer needs the answer on. That is what they can get with FurMark and WelFur being a part of this. That will give the consumer the assurance on the animal welfare, so you can be sure about the product when you buy it.

Q257 **Dr Johnson:** I just want to make a point on the labelling. It is clearly very important that people are able to make a choice in what they buy. You made the point that if somebody buys a synthetic fur bobble hat but it contains two intentionally placed pieces of animal hair, it then becomes fur and it should be labelled as such. I understand the point that you are making: that if people do not want any animal products, they want to know that is there. Equally, presumably your consumer who wishes to buy fur would feel somewhat cheated if they thought they had bought a hat made of mink fur and found out that it was actually made of plastic with two pieces of hair in it. Does that really solve the issue?

Michael Moser: I guess I concentrated on that initially because one of the primary focuses of the inquiry is people who have been misled into buying real fur when in fact they do not wish to, but that is a really valid



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point. Philosophically, it is still a problem. It is buying something you did not know you were buying; it is a form of deception.

It is a bit like food. Food must include every single ingredient that is in the product. Maybe labels should ultimately state clearly what has been included. If it is a mix of real and fake, then a label should clearly state that it is the case, because it is another form of deception. You are absolutely correct.

Q258 Dr Johnson: We are going to a farm in Denmark shortly, but could you describe to us the conditions the mink and these other animals are kept in when they are being reared?

Mette Lykke Nielsen: I can explain the WelFur programme, because that explains also how they are being kept. The WelFur programme was developed by seven different universities in Europe. We gave them a task. We saw the welfare quality programme from the EU being made for cattle, poultry and pigs, and we asked the EU whether they could make it also for mink and fox, because we think a science-based programme is the best way to advocate for this. They said this was not really an issue for the EU at the moment, so we decided we would go ahead. We asked seven different universities in Europe. We gave them the task of looking at the research from the last 40 years. We wanted them to look at everything, not just the things we wanted them to look at or whatever, but everything that has been done that has been internationally recognised and peer-reviewed. We said, "Look at this and come up with a set of measures that we can measure mink, fox and Finn raccoon farms on".

Under the four principles of the welfare quality project—i.e. good housing, good feeding, appropriate behaviour and good health—they came up with a set of 22 measures for mink and 25 measures for foxes. People go to the farm. It is not us who go to the farm, because it is not very credible that the fur sector checks the fur sector itself. Of course, we have hired an independent assessment company to do this. We had a tender like you normally do, with different companies applying, and we selected one company. It is completely independent from us as to whether the farms get the certificate or not. They go to check the farm three times in a production cycle, so we are sure that all three times of the production cycle are checked fully.

Q259 Dr Johnson: I am sorry to interrupt, but I was asking you to describe the conditions. What am I expecting to see? Am I expecting to see something like a wild safari park, with foxes running freely and occasionally being caught, picked up and cuddled? What should I expect to see? In what conditions are the animals bred? In what conditions are animals raised? How are they fed? What do you feed them?

Mette Lykke Nielsen: You will see an animal farm that is like any other agricultural production. You will come in and you will see—



Q260 **Dr Johnson:** That varies too, does it not?

Mette Lykke Nielsen: That varies too, but still you will see an animal production.

Q261 **Dr Johnson:** Are they in cages?

Mette Lykke Nielsen: In cages, yes, of course. They are raised in cages.

Q262 **Dr Johnson:** The foxes are kept in cages.

Mette Lykke Nielsen: Yes, they are.

Q263 **Dr Johnson:** Are they on their own or with other foxes?

Mette Lykke Nielsen: That depends. It depends on the size of the foxes. Normally they are kept in pairs of two, depending on whether they have kids. Then it is the mother with the cubs.

Q264 **Dr Johnson:** Do you mean pairs of a male and female?

Mette Lykke Nielsen: Yes, that will be male and female.

Q265 **Dr Johnson:** How big is the cage that this fox is kept in?

Mette Lykke Nielsen: That is something that is actually regulated by the Council of Europe standards. In the WelFur programme we look at the ability to move, so not at the direct cage size. We recognise that this is a question that is often asked, so we have said that we would put a minimum standard on our WelFur farms that they have to comply with all of the Council of Europe's recommendations. Let me give you the sizes. A single adult fox would have a cage of 0.8 square metres.

Q266 **Chair:** Did you say 0.8 square metres?

Mette Lykke Nielsen: Yes.

Dr Johnson: That is two and a half feet.

Mette Lykke Nielsen: It would have a minimum height of 70 centimetres, a minimum width of 75 centimetres and a minimum length of 100 centimetres.

Q267 **Dr Johnson:** Just for comparison with the 0.8 square metres and the 0.7 metres height, how big is your average fox?

Mette Lykke Nielsen: That is difficult to say. Yes, it is difficult for me to estimate the average fox size.

Q268 **Chair:** It seems to be pretty small to me.

Mette Lykke Nielsen: When we look at the WelFur programme, we look at the ability to move inside the cage. If you are not able to move inside the cage, you will not be able to fulfil the WelFur requirement and thereby get the pass.



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Chair: I suppose, Caroline, that we will see these things for ourselves to make a judgment, but certainly from the size, as I see it, it does not seem much room for a fox to move around in. That is for sure.

Q269 **Dr Johnson:** Do these animals stay in that cage all the time? Are they kept in that cage all the time? Do they get out to run about, or is that it?

Mette Lykke Nielsen: They are kept in the cages. They are domesticated animals. These are animals that are bred and raised in a cage, yes.

Q270 **Kerry McCarthy:** What is their lifecycle? You implied that some have kids, so they are used for breeding purposes.

Mette Lykke Nielsen: You have breeding animals. That means in the beginning of the year you have the breeding time where you mate the animals and you get the kids around April or May. You then have the killing or the pelting at the end of the year, so November or December.

Q271 **Dr Johnson:** This animal is born in May; it is put in a cage with its mum and at some point moved to a cage on its own or with a friend. It then sits in this cage for six months, and you put food in the cage.

Mette Lykke Nielsen: There is food; there are enrichments. You make sure they are activated. It is not just that they sit and live by themselves. Our farmers are really responsible farmers. They take care of the animals and make sure they have activity objects and enrichments in the cages. They make sure that they are fed.

Q272 **Kerry McCarthy:** What do you mean by "activity" in a cage of that size, though? What sort of activity could you have in a cage that is not much bigger than the fox?

Mette Lykke Nielsen: For the foxes, it would be a bone. That is the activity objective that the science has established is one of those that gives a lot of activity for the animal and a lot of expression of natural behaviour. It is the same for the mink. It would be a soft plastic tube that they can manipulate. For the mink, the single enrichment that has the most effect according to the science is the nest box, so where they can build a proper nest in a cage.

Q273 **Dr Johnson:** The fox is born in the spring. It is in a cage. It is 0.88 square metres and 70 centimetres tall. It stays in there without coming out until it is killed for the fur. How long is its lifespan?

Mette Lykke Nielsen: That is between the birth in May until the pelting at the end of November, unless it is a breeding animal. It can then be up to two or three years.

Q274 **Dr Johnson:** Will it have reached full height or full size by that time?

Mette Lykke Nielsen: Yes.

Q275 **Dr Johnson:** Basically, you grow it to full size and then you kill it off.



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How long do you keep the breeding animals for?

Mette Lykke Nielsen: That depends on their performance, but between two and three seasons.

Q276 **Dr Johnson:** You would pick out foxes that you thought were—

Mette Lykke Nielsen: You would pick foxes out using different selection criteria. This is quite important when we are talking about fur farming. You have to select the right animals for breeding. For instance, you can test for behaviour. You want to breed animals that are curious and that have a good level of animal welfare. You want to breed foxes that have the right bone structure so you do not create diseases, et cetera, so you are sure you are selecting the right animals for breeding.

Q277 **Dr Johnson:** So those foxes would be kept in a cage and just bred, and then do you kill them for their fur at the end of the three years?

Mette Lykke Nielsen: Yes.

Q278 **Kerry McCarthy:** Can I just ask a couple more questions following on from that? How often do they breed?

Mette Lykke Nielsen: They breed once a year.

Q279 **Kerry McCarthy:** How many cubs would that be?

Mette Lykke Nielsen: It also depends. Five or six.

Q280 **Kerry McCarthy:** How are they killed?

Mette Lykke Nielsen: There are killing methods that are established by the European Union. The European Union actually did that for all animal species. They established that it should be by science. For mink, they are killed with CO₂ in a gas box. This was the science that was recommended for killing them. For foxes, it is by electrocution. This has also been established by science to be the most humane and fast way to kill the fox.

Q281 **Dr Johnson:** Is it the red foxes that you have?

Mette Lykke Nielsen: We have blue foxes and also red foxes, yes.

Q282 **Dr Johnson:** From a size point of view, the British Wildlife Centre website I am looking at says the average fox's body length is 62 to 72 centimetres, plus a tail of 39 to 41 centimetres. Is that about what you would expect?

Mette Lykke Nielsen: It is a different breed, because that is the wild fox. The foxes in the cages have been domesticated for several generations. It is not really comparable. One is wild and one is not.

Q283 **Dr Johnson:** Yours are smaller than that.

Mette Lykke Nielsen: Ours would probably be a little bit bigger than that, yes.



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Q284 **Dr Johnson:** They would be bigger, within that size of cage.

Mette Lykke Nielsen: Yes.

Q285 **Dr Johnson:** They are almost as long as the cage.

Mette Lykke Nielsen: They are not as long as the cage, no. They are still able to move around; they are still able to jump in the cage. They are not as long as the cage, no.

Q286 **Dr Johnson:** Can they jump?

Mette Lykke Nielsen: Yes, they can jump in the cage.

Dr Johnson: You said it was 70 centimetres, but they can jump.

Q287 **Kerry McCarthy:** Talking about the labelling scheme, can you explain a little bit about how you have the welfare certification and then there is this idea of FurMark? How will that work?

Mette Lykke Nielsen: Do you mean how it will work with FurMark?

Q288 **Kerry McCarthy:** Yes. If there is such a thing as good welfare in fur farming, how can people be sure they were getting a higher welfare standard product?

Mette Lykke Nielsen: They can be sure when they see the FurMark brand. If the fur is coming from the WelFur farms, they can be sure that it meets the proper standards, and it is the same for other regions.

Q289 **Kerry McCarthy:** It is the industry who has decided how high the bar is set.

Mette Lykke Nielsen: In terms of welfare, no, not really. The level and the bar in welfare are not set by the industry; it is set by the scientists. It is actually also a dynamic programme. Whenever new science comes, it will have to be included in the WelFur programme.

Q290 **Kerry McCarthy:** I know you started saying that the farms would be checked three times every production cycle. Who is it who carries out those inspections?

Mette Lykke Nielsen: It is a company called Baltic Control. They work for the EU, the UN and also for the Danish animal protection society. They are the ones going out and performing the tests on the farms.

Q291 **Kerry McCarthy:** They are funded by the fur companies.

Mette Lykke Nielsen: They are funded by Fur Europe, but it is completely independent in terms of them giving the certificates. We have a contract with them. We tell them, "You have to go out and check the performance on the farm". We do not train them either. They are trained by the welfare scientists to make sure they are not in any way told from us what to actually do on the farms. That training is kept completely separate.



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Q292 **Kerry McCarthy:** They will only go to the farms that are aspiring to get the mark, to go under this scheme.

Mette Lykke Nielsen: That is true. At the moment, there are around 4,000 mink and fox farms. We have visited and registered 3,089 farms. They have until the end of this year to register. You also have to put this into the perspective of the need for the farmers to sell via the auction houses. There are three big auction houses in Europe and one in North America that sell the majority of the fur from European farms. Those three auction houses have said that they will no longer collect skins from farms that are not welfare-certified. In reality, it is very difficult for a farmer outside the programme to maintain his or her business.

Q293 **Kerry McCarthy:** This company doing the checks has a financial interest in ensuring that as many farms as possible meet the criteria.

Mette Lykke Nielsen: No, there is nothing—

Q294 **Kerry McCarthy:** They are getting paid by farms that want to go through that process.

Mette Lykke Nielsen: They get a fee, but they do not get a fee whether a farm passes or not. They get the fee anyway. They have been told—

Kerry McCarthy: It is only the farms that are aspiring to be in the scheme that are paying the fee.

Q295 **Chair:** Is it paid by a levy? How is it paid?

Mette Lykke Nielsen: It is paid by Fur Europe via a levy. A single farmer pays to have a visit and we pay the rest. The buyers of the fur have shown a lot of interest in the programme, and they have said, "We also want to invest in having this. We also want to give an assurance to our consumers", so they are paying a levy to the auction houses, which we then use to—

Q296 **Kerry McCarthy:** It is not in their interests, though. I am trying to get to the bottom of this. They have an interest in ensuring that as many fur companies as possible are within the scheme.

Mette Lykke Nielsen: We have an interest in making sure fur farms in Europe are certified. I have no interest in having farms in that are not coming up to the criteria.

Q297 **Kerry McCarthy:** But this company that you spoke of that is doing the inspections has an interest in making sure as many companies as possible are within the scheme.

Mette Lykke Nielsen: That is not how they are—

Kerry McCarthy: That is how they are funded.

Mette Lykke Nielsen: For me, it is not a matter of 100% certification. For me, it is a matter of having everybody certified who fulfils the criteria. They have to check in the right way—in the way they were taught by the



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scientists. The farms have to pass an exam. There is also a complaints system to check this. We do not accept farms that do not live up to the welfare criteria.

Q298 **Kerry McCarthy:** What proportion of farms have already become a part of this certification scheme? What percentage do not want to know?

Mette Lykke Nielsen: 3,089 have so far signed up.

Q299 **Kerry McCarthy:** What is the percentage?

Mette Lykke Nielsen: You have to understand the way we work. In 2016, we took the decision to start implementation of the WelFur programme. We said to farmers, "From 1 January 2017, you can start implementation". We gave them three years to comply. We said, "By 2020, the door closes. If you are not in, you are out". Up until now, 90% of the farmers have registered to the WelFur certification.

Q300 **Kerry McCarthy:** At the moment, 90% consider that they meet this higher benchmark.

Mette Lykke Nielsen: No, 90% have signed up to get the assessment, yes.

Q301 **Kerry McCarthy:** If almost every product is going to carry this higher welfare mark, does that not rather devalue the purpose?

Mette Lykke Nielsen: I am not saying 90% will pass the system. I am saying 90% have signed up for the system. We will have to see. Right now we have not had so many farms going through the three visits. We will see that by the end of 2019. We will then have a clear picture of how many farms actually fulfil the criteria and thus how many will be able to sell on the market.

Q302 **Chair:** Are these farms still using that so-called higher welfare mark now?

Mette Lykke Nielsen: You are not able to use the label until you have all three certifications and a certificate. We have said that the first time you can use the certificate is 1 December 2018. There is a very small range, but the first farmers will go through. By 2019, they are getting—

Q303 **Chair:** Those are the ones who have met your standards. The ones who are trying to comply to your standards by 2019-20 cannot actually use that mark until they have complied with it.

Mette Lykke Nielsen: No, not at all.

Mark Oaten: They will not be able to sell at auction after 2020. It will only be 100% that are certified.

Q304 **Kerry McCarthy:** Will there be an ongoing inspection regime?

Mette Lykke Nielsen: Yes.



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Q305 **Kerry McCarthy:** Once you have the certification, presumably there will be ongoing inspection.

Mette Lykke Nielsen: Of course, yes. It is not that you get three visits and then you are home and safe for the rest of your life.

Q306 **Kerry McCarthy:** You say there are 22 measures for mink and 25 for foxes. Let us say they were found to no longer be meeting half of those measures. Would they have the mark immediately taken away? If they were only meeting 21 out of 22, would they get it taken away?

Mette Lykke Nielsen: If we find out there is a breach of the Welfur certification system, we will take away the label immediately.

Q307 **Kerry McCarthy:** Would that be for any one of those measures? If there are 25 measures for foxes—

Mette Lykke Nielsen: No, it is a complex calculation. The welfare quality system, not only for mink and foxes but for all animal welfare, is constructed as a calculation method that goes across. This is also the strength of the programme. You cannot only pass on certain criteria and not on others. It is a calculation system. For instance, there are measures that cover issues on animal health but also on good feeling, because they are testing both things.

Q308 **Kerry McCarthy:** I am not clear, though. You have said the scientific experts said that there are 22 measures that ought to be met for mink and 25 for foxes. To get the Welfur mark, do you have to have met all of those measures?

Mette Lykke Nielsen: The assessment programme is done via a set of scores. You go out and you check these 22 measures.

Q309 **Kerry McCarthy:** You could be good on some and bad on others and still get the mark.

Mette Lykke Nielsen: That is actually not what I am saying. You cannot be good in some and bad in some, because then you would fail, but you have to have an average of the whole. Let us take one example from the measures. There is the stick test that is done for the mink. It is one of the tests that you do to express the natural behaviour. You look into the category of the principle of appropriate behaviour. You check whether the mink is curious, fearful, stressed or aggressive. That does not only look at the behaviour side. That actually could also be related to things on the disease side, and it could be related to good housing and feeding. Is it stressed? Does it have enough enrichments? These are cross-cutting issues. It is difficult for me to say, "If you do not pass one of the 22, you are out", but I can say that within the 22 you are weighted and measured in a thorough way between the four principles.

You also cannot fail in one period and still pass. You have to have an average between all three periods. If you look at other animal husbandry, normally how you are checked is the authorities do one, two



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or three visits. They have a check-box list and they say, "Okay, you pass", but here you have to have a weighted result between the three visits. You actually have to pass the growth period, the weaning and the winter period. You have to pass all three periods to get through. It is a very complex mathematical system that was done and developed by INRA university in France, but it is a weighted system so it is actually quite thorough in terms of the level of animal welfare

Q310 Kerry McCarthy: We are pushed for time, but it might be helpful if you could write in with a bit more clarity on how removing the mark from people or future enforcement would work and what exactly would constitute a fail.

Chair: Yes, that would be a good idea.

Mette Lykke Nielsen: I just want to make it very clear that we will not accept a farmer that is not WelFur-certified keeping the certificate. For me, the most important thing is to be a responsible and credible partner. We cannot be that if we do not want to withdraw the certificate. If I find a farmer who is not complying with the welfare standards, I would like to immediately remove the certificate. I have no interest in that farmer keeping it.

Q311 Kerry McCarthy: You talk about expressing natural behaviour. It is clearly not natural for a fox to be in a cage. It is clearly not natural for even a domesticated animal to be in a cage.

Mette Lykke Nielsen: I think it is. It expresses natural behaviour. If you look at breeding in captivity, that is one of the things that you also can measure natural behaviour with. Would you breed in captivity if you were stressful and would not like to be there? They can do that. For mink, they do it. That is the practice we do on the farms. For the foxes, we do insemination, but that is not because they do not do it; that is because it is a much more effective way of doing it. Actually, breeding in captivity is one of the things where you can actually see that they express natural behaviour.

Also, if you look at the human-animal relationship between the fox owner and the fox, you can also see that it is able to relate to the human and to show natural behaviour.

Q312 Kerry McCarthy: Is natural behaviour not how an animal would behave naturally without human intervention?

Mette Lykke Nielsen: Natural behaviour is how the animal behaves in the domesticated—I mean, this is a domesticated animal. It would be very different if you took a wild mink and you put it into a cage. This would be animal cruelty. But here you are talking about a domesticated animal that has been domesticated for generations and generations. Those are expressing natural behaviour in the caged environment.

Q313 Chair: Okay, we will try to make our judgments when we get there. I



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just have one final point before you go. I do not particularly like the standards you talk about in Europe, but I suspect the standards in China are even worse. What is the situation about the trade with China? Some of the worst animal welfare stories come from China. What sort of monitoring does anybody do of what is happening in China?

Mark Oaten: As I said, I was in Beijing in January of this year with the Government Department on this. It is the State Forestry Administration that has responsibility for farming in China. I believe they get this; they understand it is important. They have looked at the welfare protocols; they have looked at the Council of Europe. I have a long set of standards that they are working on with scientists.

As I mentioned earlier on, my reservation is not the commitment. My reservation is the ability to put in place the regime inspection system such as we have in America and Canada with wild fur and other fur types. We have an independent agency called Baltic Control working in Europe. What we would need to do is make sure there was that level of independent robustness in the Chinese system. That is the missing element at the moment.

Q314 **Chair:** Very quickly, Israel and Switzerland are considering a ban on imported fur. What impact do these bans have on the global fur market? Will that just drive the price of fur down? Will we have even more problems with real fur being traded as fake?

Mark Oaten: In Israel, there is not an economic issue. It is more a matter of principle in that country. In Switzerland, there is an economic issue, because it is a country where there is a lot of fur that is sold. It would have an impact on the industry if there were to be a total ban in Switzerland, particularly if you imagine the number of skiing resorts. There are a lot of retailers there, so there would be an economic impact there, but less so in Israel.

Chair: Thank you very much for your evidence. We must go to PMQs now. Thank you very much.