THE HUMANE SOCIETY
OF THE UNITED STATES

May 16, 2011

Federal Trade Commission
Office of the Secretary, Room H–113 (Annex O)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Advance Notice of Proposed Rulemaking under the Fur Products Labeling Act; Matter No. P074201

On behalf of the more than 11 million members and supporters of The Humane Society of the United States (HSUS), I submit the following comments to be considered regarding the Federal Trade Commission's (FTC) advance notice of proposed rulemaking under the federal Fur Products Labeling Act (FPLA), 16 U.S.C. § 69, *et seq*.

The rulemaking is being proposed in response to the Truth in Fur Labeling Act (TFLA), Public Law 111–113, enacted in December 2010, which eliminates the *de minimis* value exemption from the FPLA, 16 U.S.C. § 69(d), and directs the FTC to initiate a review of the Fur Products Name Guide, 16 C.F.R. 301.0. Thus, the FTC indicated in its notice that it is specifically seeking comment on the Name Guide, though the agency is also generally seeking comment on its fur rules in their entirety.

As discussed below, the HSUS believes that there is a continuing need for the fur rules and for more active enforcement of these rules by the FTC. The purpose of the FPLA and the fur rules is to ensure that consumers receive truthful and accurate information about the fur content of the products they are purchasing. Unfortunately, sales of unlabeled and mislabeled fur garments, and inaccurate or misleading advertising of fur garments, remain all too common occurrences in today's marketplace. The elimination of the *de minimis* value exemption from the FPLA, and the corresponding provisions of the FTC's fur rules, 16 C.F.R. 301.39, will help ensure that all fur-containing garments are labeled and advertised with important information for consumers. However, diligent enforcement of the fur rules is necessary to ensure that consumers receive accurate information about the products they are buying.

Further, the HSUS believes that several entries in the Name Guide require amendment to conform to the requirements that all names contained therein are "the true English names for the animals in question," 16 U.S.C. § 69e(a), that the

names do not mislead or deceive as to the animal's "geographical or zoological origin," 16 C.F.R. 301.17, and that "no trade names [or] coined names" are used, 16 C.F.R. 301.11. By example, one of the most commonly used animals in fur garments today, the raccoon dog (*Nyctereutes procyonoides*), is listed in the Name Guide by the industry trade name "Asiatic raccoon," despite the fact that the species is taxonomically identified as a member of the Canidae (dog) family and not a member of the Procyonidae (raccoon) family, the species has always been referred to by the common name "raccoon dog" in all other arenas, and the use of the term "Asiatic raccoon" is itself confusing to consumers.[1] Use of industry trade names, rather than the zoologically accurate true English names, for the animals who are used to produce fur garments remains a problem.

Further, the HSUS believes that the fur rules should be amended to provide more rigid guidance to the regulated community with regard to what names satisfy the requirement that "true English names" be used. Specifically, the fur rules should indicate that the name to be used should be the true English name most widely accepted *by the scientific community*, and the FTC should indicate that the Integrated Taxonomic Information System (ITIS) is considered an acceptable authority in this regard.

The Fur Products Labeling Act and the FTC's Fur Rules

In response to rampant false advertising and false labeling of animal fur garments, Congress passed the FPLA in 1951, with the law taking effect in 1952, requiring that animal fur garments be labeled with the name of the species used, country of origin, and other information. The law was intended to prevent unfair competition in the marketplace and to protect consumers by providing product information and letting them know whether the product is made from real animal fur, and if so, what type of fur. A *New York Times* article published when the law took effect noted that the new law was "enacted to eliminate unfair trade practices and deceptive merchandising and advertising of fur coats."[2]

The FPLA prohibits misbranding and false and deceptive advertising and invoicing of most fur products. 15 U.S.C. § 69 *et seq.* The FPLA and the fur rules require manufacturers and retailers to place labels on fur products that disclose: (1) the animal's name as provided in the Name Guide; (2) the presence of any used, bleached, dyed, or otherwise artificially colored fur; (3) that the garment is composed of paws, tails, bellies, or waste fur, if that is the case; (4) the name or RIN of the manufacturer or other party responsible for the garment; and (5) the garment's country of origin. 15 U.S.C. § 69b(2); 16 CFR 301.2(a). Similar requirements apply to advertising of fur products. 15 U.S.C. § 69c(a); 16 CFR 301.2(c). The FPLA and the fur rules also provide that a retailer or other dealer is immune

[1] The HSUS also incorporates into this comment letter the separate comments on alteration of the Fur Products Name Guide that have been prepared on behalf of the HSUS by Lauren Nolfo-Clements of the Department of Biology at Suffolk University. This comment letter is attached.
[2] "Fur-Labeling Law Starts Tomorrow." The New York Times. August 8, 1952.

from liability under the law if it receives a written guarantee from the manufacturer that the fur product is not misbranded or falsely or deceptively advertised or invoiced. 15 U.S.C. § 69h; 16 CFR 301.47-301.48a. However, such guarantees must be received in good faith, and the retailer or other dealer must have examined the label, advertising and invoices, and must not have knowledge that the fur product is misbranded or falsely or deceptively advertised or invoiced. *Id*.

At the time the FPLA was passed, some sellers were using misleading terms such as "mink-dyed muskrat" for muskrat coats, "coney" for rabbit fur, and "marten dyed skunk" for skunk, and leaders of the fur industry called for strict labeling standards to ensure that consumers had accurate and consistent product information.[3] To address this issue, the FPLA included a requirement that the FTC develop a Fur Products Name Guide to include names for the various species of animals used to produce fur garments. 16 U.S.C. § 69e. Because the purpose of the Name Guide was to prevent consumer confusion and deception, the FPLA and fur rules require that all names contained in the Name Guide are "the true English names for the animals in question," 16 U.S.C. § 69e(a), that the names do not mislead or deceive as to the animal's "geographical or zoological origin," 16 C.F.R. 301.17, and that "no trade names [or] coined names" are used, 16 C.F.R. 301.11.

The fur rules have been useful in ensuring consistent information is provided to consumers, and leveling the playing field for fur retailers. However, inaccurate information is still being disseminated to consumers, causing consumer confusion. This problem has been exacerbated by the fact that the "*de minimis* value exemption" in the FPLA has allowed numerous fur-trimmed garments to be marketed and sold without information that would otherwise be required by the FPLA.

The Truth in Fur Labeling Act

When the FPLA was passed, it exempted products with a "relatively small quantity or value" of fur. 15 U.S.C. § 69(d). At the time, fur was primarily used for full-length coats and stoles, and fur-trimmed and faux fur items were relatively uncommon. More than a half-century later, however, the market has been inverted: fashions have changed, and the market demand for fur trim is much larger. As many fur-trimmed garments are sold today as full-length fur coats, and the fur industry has predicted that the use of fur for trim in the United States could surpass the use of fur for full-length apparel, if it hasn't already. With the improvements in synthetic materials, it is also more difficult today to distinguish

[3] *See*, *e.g.*, Statement of Joseph H. Francis, Executive Secretary, National Board of Fur Farming Organizations, Hearing before House Comm. on Interstate and Foreign Commerce on H.R. 3734, at 13-14 (April 6-7, 1948) ("…the public knows very little about the various kinds and quality of fur articles offered for sale. This fact has been largely responsible for many unfair trade practices being carried on in the fur industry today." . . . "To continue the practice now in effect of using whatsoever names or combination of names as one may choose to use merely in order to promote the sale . . . can add nothing short of confusion . . . .").

between real and faux fur. The existing labeling law has not kept pace with the changes in the marketplace, and simply does not reflect the present market realities.

To address these concerns, Congress enacted the TFLA in December 2010. Public Law 111–113. The primary purpose of the TFLA was to eliminate the "*de minimis* value exemption" in the FPLA. However, the TFLA also requires the FTC to consider amendments to the Name Guide.

Other Related Federal, State and Local Laws

In its notice of proposed rulemaking, the FTC asked whether there is any "overlap or conflict with other Federal, State, or local laws or regulations." While there are several laws that overlap or interact with the FPLA and the fur rules, all such laws simply serve to better protect consumers against unfair and deceptive trade practices, and none present a conflict creating problems with implementation of the FPLA or the fur rules. The most relevant related laws are discussed here below.

First, the FPLA specifically grants the FTC additional means of enforcement of the FPLA by making sale and advertising of fur products that are misbranded or falsely or deceptively advertised or invoiced *per se* violations of the prohibitions on unfair methods of competition and unfair and deceptive acts or practices under the Federal Trade Commission Act (FTCA), 15 U.S.C. § 41, *et seq*. 16 U.S.C. § 69a. Such violations, as well as falsification of invoices, furnishing false guaranty letters, and other violations of the FPLA are all enforceable under the FTCA and corresponding regulations. 16 U.S.C. § 69f(a).

Further, in addition to standard state consumer protection laws, common in most states, that protect consumers against unfair and deceptive trade practices, at least five states have enacted fur-specific labeling laws – Delaware, Massachusetts, New Jersey, New York, and Wisconsin.[4] These state laws essentially require that all fur and fur-trimmed garments sold in those states be accurately labeled, while, until the recent enactment of the TFLA and the elimination of the *de minimis* value exemption, the federal fur labeling law only applied to most fur and fur-trimmed garments. In some instances, these state laws continue to be more stringent than the FPLA.[5]

None of these state laws creates a direct conflict with the FPLA; they operate alongside, and to supplement, the federal regulatory scheme concerning fur labeling and advertising. Regardless, it is clear that Congress did not intend for the FPLA to preempt co-extensive or more stringent state laws concerning labeling and advertising of fur garments. In fact, two such state laws—in Massachusetts and Wisconsin—were already in place *before* the FPLA was enacted, and no language expressly preempting these state laws was included in the

[4] 6 Del.C. § 2508; M.G.L.A. 94 § 277A; N.J.S.A. 56:14-1; N.Y. Gen.Bus.Law § 399-aaa; W.S.A. 100.35.
[5] *See* N.Y. Gen.Bus.Law § 399-aaa (requiring a fixed tag stating "faux fur" or "real fur").

federal law. State fur-specific labeling laws simply provide a means for individual states to ensure that their citizens are provided accurate information about the fur content in garments.

Industry Compliance and Continued Need for the Rules

Unlabeled and mislabeled fur-trimmed garments—many of which are also falsely advertised—are a widespread problem for retailers and consumers across the nation. A series of recent investigations by the HSUS revealed that dozens of designers and retailers were selling some fur-trimmed jackets described as "faux" or not labeled at all, which turned out to contain animal fur, including many of which were made of raccoon dog fur. The source of the fur in garments that the HSUS has identified as falsely advertised or mislabeled has been confirmed by independent laboratory testing in dozens of cases.[6]

Of a group of 38 jackets subjected to mass spectrometry testing, every single garment was either unlabeled, contained a label that misidentified the animal, or was falsely advertised. Several of these jackets were sold as "faux" fur when in fact they were raccoon dog, domestic dog, or rabbit fur. Others were advertised as "raccoon" or "rabbit" fur when in fact the fur was from raccoon dogs. Three of the jackets advertised as fake fur—two of which had no label—were found to contain fur from domestic dogs.[7] Many unlabeled or mislabeled garments are sourced from China.

A complete list of this group of 38 jackets tested by the HSUS is attached. The HSUS has received multiple letters from retailers acknowledging that advertising or labeling of animal fur garments was incorrect and that they had taken action to correct the problems in their stores. Some companies have even adopted fur-free policies in response to the HSUS's investigative findings.

On several occasions, companies advised the HSUS that they had guaranties from manufacturers indicating that all fur and fur-trimmed garments provided by that vendor are accurately labeled. However, these guaranties, sometimes described in a single provision of a sales contract, typically fail to indicate the specific types of animals from which the fur was derived. Instead, they effectively certify that the fur contained in the

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[6] In November 2008, the HSUS filed a lawsuit in relation to several of its investigative findings. In January 2010, the D.C. Superior Court entered a judgment against Neiman Marcus for violation of the District of Columbia's consumer protection statute, and settlement agreements were reached with four other defendants, in which these companies agreed, *inter alia*, to reform their labeling and/or advertising practices.

[7] In 2000, Congress banned the import of fur products made from domestic dogs and cats, but customers are still wary that dog and cat fur is slipping into the United States because these garments have been found being sold without labels.

garments is whatever the labels or the tags on the garments say it is. Such guaranties are obviously ineffective if the jackets are unlabeled, contain multiple conflicting labels, or are mislabeled.

HSUS investigations have found that dissemination of inaccurate information regarding the fur content in garments is most prevalent in mainstream department stores. Retail sales clerks are not experts in fur material, and they are dealing with merchandise that cycles through their departments regularly. A rack of jackets with a sign advertising "fake fur" may include some real fur as well, as inventory changes or as customers and salespeople try on items and then return them to the wrong racks. When jackets are not labeled, or contain conflicting labels, individual consumers have no choice but to trust what they are told by a sales clerk or what they read in advertising materials. Sales clerks have inaccurately described the fur content of jackets in several investigations by the HSUS.

While it is difficult to tell one species of fur from another without a label, it has also become increasingly difficult to tell animal fur from fake fur, due to the realistic look of synthetic fur and the fake look of some animal fur (due to dyeing, bleaching and other manufacturing techniques). Since most consumers and sales clerks cannot tell the difference between animal fur and fake fur simply by visually inspecting the garment, the inclusion of a clear and accurate label is the only answer to this problem.

Recommended Modifications to the Fur Rules

Fur Products Name Guide

In order to ensure that consumers are presented with uniform, accurate, and useful information about the types of animals from whom fur is taken for the purpose of making a particular fur garment, the Name Guide should be amended to meet the requirements that all names contained in the Name Guide are "the true English names for the animals in question," 16 U.S.C. § 69e(a), that the names do not mislead or deceive as to the animal's "geographical or zoological origin," 16 C.F.R. 301.17, and that "no trade names [or] coined names" are used, 16 C.F.R. 301.11.

Recognizing that the names of species occasionally change, and that species not explicitly referenced in the Name Guide may be used in the production of fur products, the FTC's fur rules require that in the absence of entry on the Name Guide, the regulated community is required to use the "the true English names for the animals in question," 16 U.S.C. § 69e(a). However, it appears that some in the fur trade believe that the appropriate common name to be used is open to interpretation.

By example, the true English name of *Prionailurus bengalensis*, a small banded and spotted cat species found in the forests of Asia, the conservation status of which is vulnerable due to

habitat loss and hunting, should be the "leopard cat." Within the academic and scientific community, the singular accepted common name of this species is the "leopard cat." Anyone who sees one of these animals in a zoo, or sees its picture online, will see the animal described as "leopard cat." However, the fur industry and fashion press often refer to this species as "lippi cat," "lipi cat," or simply "lippi" or "lipi," and have done so for many years., despite the fact that the fur regulations require only the true English name of an animal to be used, and specifically prohibit "trade names [or] coined names," 16 C.F.R. 301.11.

The HSUS believes that the fur rules should be amended to provide more rigid guidance to the regulated community with regard to what names satisfy the requirement that "true English names" be used. Specifically, the fur rules should indicate that the name to be used should be the true English name most widely accepted by the *scientific community*. Common names accepted by the scientific community will be those most often used by zoological institutions, museums, educational institutions, and governmental entities, where members of the public typically learn about these animals.

In addition, each species should be known by only one name, and one name should only apply to one species, as is the standard for the scientific community's use of common name. The present Name Guide uses general terms such as "bear," "fox," and "hare" to refer to several or even several dozen distinct species. Not only are the animals that fall within these overly broad descriptors taxonomically distinct as different species, but consumers may want to avoid purchasing fur products from some of these animals and not others. By example, some bears from Europe and Asia are listed as endangered under the United States' Endangered Species Act (ESA), 16 U.S.C. §1531, *et seq*. Others that are not protected by the ESA are still vulnerable to severe cruelty and exploitation, such as sun bears (*Helarctos malayanus*), which are commonly killed for use of their gall bladders in traditional Chinese medicine.[8] A consumer may specifically want to avoid purchasing a fur product made from the pelt of one bear species as opposed to another.

As further guidance, the FTC should indicate that the Integrated Taxonomic Information System (ITIS) is considered an acceptable authority in this regard. ITIS is the result of a partnership of federal governmental agencies formed to satisfy the need for scientifically credible taxonomic information.[9] The original ITIS partners include the National Oceanic and Atmospheric Administration, the United States Geological Survey, the Environmental Protection Agency, the Agricultural Research Service, the Natural Resources Conservation Service, and the Smithsonian Institution (including the National Museum of Natural History). The U.S. Fish and Wildlife Service is a current partner. The ITIS website contains an easily accessible database with reliable information on species names and their hierarchical classification. As such, it would be an excellent source for the FTC to suggest

[8] *See* http://animaldiversity.ummz.umich.edu/site/accounts/information/Helarctos_malayanus.html
[9] *See* http://www.itis.gov/.

that the regulated community use in determining the proper common name to use for an animal not explicitly referenced on the Name Guide.

Perhaps the most problematic of all species recently has been the raccoon dog (*Nyctereutes procyonoides*), which is listed incorrectly on the Name Guide as "Asiatic Raccoon" and has been found being promoted, advertised, or labeled by a number of additional names, including "raccoon" and "finnraccoon."

A. *The Name "Asiatic Raccoon" should be Replaced by the Name "Raccoon Dog" and no Other Names should be Allowed for Nyctereutes procyonoides.*

The scientifically accepted common name "raccoon dog" reflects the correct taxonomic identification of the species. ITIS lists only one common name for *Nyctereutes procyonoides*: "raccoon dog."[10] Several other scientific sources also refer to the species by the common name "raccoon dog."[11] Biologist Lauren Nolfo-Clements, in her attached letter, states: "Its common name "raccoon dog" has been used by scientists for well over a century. Today, the common name "raccoon dog", sometimes preceded by "Asiatic", "Japanese", or "Chinese", is the only common name used to refer to this animal in the scientific literature."

Further, "raccoon dog" has always been the most widely-accepted common name of the species. Henry Poland, in his 1892 book Fur-Bearing Animals in Nature and Commerce (attached), notes that this animal has been sold under fake names—"Jackal, Badger, or Japanese Fox"—but titles his entry for the animal as "Raccoon-Like Dog (Canis procynides) and within the entry refers to it as "The Raccoon Dog." The 1920 publication Petersen's Fur Traders Lexicon (attached), contains the entry "Raccoon Dog":

> "This animal, called Tanuki by Japanese and Kju Hao Tze by the Chinese, is listed by different traders as the Jap Fox, Sea Fox and Chinese Badger. In spite of the fact that it approximates closely to the badger in its habits, it is really a dog, resembling the raccoon in appearance; and scientists have rightly classed it the Raccoon Dog. 150,000, of the skins marketed annually, come from China; 140,000, from Japan; and 30,000, from Korea; but they are all listed by American fur traders as Jap Foxes."

Arthur Samet's 1950 Pictorial Encyclopedia of Furs candidly reports how despite knowing the true name of the animal, the fur trade will continue to use a different "guise," suggesting how the "Asiatic Raccoon" came to be listed on the Name Guide:

> "Is this fur bearer, raccoon, fox, wolf or dog? As fur men we may resent the truth of zoological study which reveals this fur bearer as a 'Dog.' Yet because of its raccoon likeness, zoologists call it the Raccoon Dog. Think not, however, that our Asiatic raccoons will go the

[10] *See* http://www.itis.gov/servlet/SingleRpt/SingleRpt?search_topic=TSN&search_value=183821&print_version=PRT&source=to_print. (Accessed May 16, 2011).

[11] *See* Comment Letter from Lauren Nolfo-Clements, Phd., attached.

> dogs. In spite of the fact that the fox and wolf and dog are all in one family of 'dogs', the world's 'Fur Trade' will continue to recognize the name of the raccoon as the old standby."

In Beautiful Fur Animals and Their Colour Genetics (attached), published in 1988 by Scientifur, the authors devote a chapter to the "Raccoon Dog" that begins: "The raccoon dog belongs taxonomically to the family Canidae." The 2005 publication Fun Fur? A Report on the Chinese Fur Industry (attached), and accompanying video footage, reported findings that shook up the industry and was responsible for introducing many consumers worldwide to the raccoon dog, and their brutal treatment, including being skinned alive: "In Chinese fur farms, foxes, raccoon dogs, mink, and rabbits are confined to cramped wire mesh cages."

Even the U.S. Fish and Wildlife Service (FWS) has referred to the species as "raccoon dog." In December 1982, the FWS sent out a press release announcing the listing of raccoon dogs as an injurious species under the Lacey Act, 18 U.S.C. § 42. (attached). In its U.S. Wildlife Trade: An Overview for 1997-2003, the FWS again refers to the species as "raccoon dog" (attached).

The term "Asiatic Raccoon" is itself confusing and misleading. As noted above, the species is not a raccoon, yet that's exactly what "Asiatic raccoon" implies. The species is not just found in Asia, but introduced populations are found in the wild in numerous European countries, and the fur industry in Finland is currently raising raccoon dogs in cage-confinement operations for their fur. Therefore a Name Guide designation that includes a geographic descriptor "Asiatic" could be confusing, especially when it is not part of an accepted common name. Note that the fur rules presume that this exact type of geographic origin issue can cause confusion. 16 C.F.R. 301.7; 301.17. Further, Nolfo-Clements indicates in her letter there is some evidence that raccoons (*Procyon lotor*) now exist in the wild in Asia, as an invasive species. This has the potential to create confusion, because consumers may believe they are buying fur from a raccoon (*P. lotor*) found in Asia as opposed to a raccoon found in North America, when they are really buying fur from the raccoon dog.

B. Other Entries in the Name Guide that Should be Changed

The FTC has not amended the Name Guide for over 40 years, and has not fully updated all the data since its adoption in 1952, and as a result the Name Guide is outdated and contains numerous errors. Several of the entries in the Name Guide are no longer the accepted common name, appear to have never been the accepted common name, or even appear to be trade names, and would not properly inform the consumer, e.g., bassarisk, burunduk, susilk, Kolinsky, lynx cat, Pahmi, Peshcanik and Asiatic raccoon. As such, all of the entries in the Name Guide should be reviewed for accuracy, and to ensure that common names for all species regularly or occasionally used in fur products are included.

Attached is the current Name Guide, with taxonomic data updated from ITIS, with the use of fur industry animal guides and other sources to determine intended species for the

apparent trade names. This is not intended to suggest what the new name guide should look like, but to highlight the totality of what is covered, what needs updating or deleting, and problem areas such as dual entries of the same species. The FTC may consider, for example, rather than exhaustively listing all species of chipmunk, simply listing the most prevalent, leaving the others to be found on ITIS by regulated parties and consumers. It may also prove useful to list common names alphabetically by the first letter of the first word in the name, to avoid any untended relationship implications, and to reduce the potential for misunderstanding among retailers and consumers about whether a first word is a color, or other descriptor, or an intrinsic part of the common name. The FTC should determine a method of selecting among common names, both when listed in the Name Guide, and not, when more than one common name is both valid to the scientific community and well-known to the public.

Vendor Guarantees

The HSUS is concerned that the guarantees permitted under the fur rules are not sufficient to ensure that consumers receive accurate information about the fur content of garments. Separate guarantees require that the specific "merchandise covered" be listed on the guarantee, along with the name and address of the manufacturer or shipper and the date of shipment. 15 U.S.C. § 69h(a); 16 CFR 301.47. However, the FPLA also permits manufacturers and vendors to file continuing guarantees with the FTC, and the FPLA provides that a continuing guarantee may be "applicable to any fur product or fur handled by a guarantor." 15 U.S.C. § 69h(a). The current form that the FTC *requires* manufacturers or shippers to use only requires the guarantor to check a box beside the following statement:

> "The company named above, which manufactures, markets, or handles fur products, guarantees that when it ships or delivers any fur product, the product will not be misbranded, falsely or deceptively invoiced, or falsely or deceptively advertised, within the meaning of the Fur Products Labeling Act and the rules and regulations under that Act."

Continuing Guaranty, *at* http://www.ftc.gov/os/statutes/textile/ftc31a.shtm; *see also* 16 CFR 301.48(a) (requiring use of the form).

Nothing in the FPLA prohibits the FTC from requiring that continuing guarantees specifically designate the fur products or furs guaranteed, as is required of separate guarantees. Too often retailers are left to rely on information provided by the vendor during the buying process months before retailers receive final products, or information found on hang tags or other information in the shipping containers with the garments, to determine what type of fur the vendor is guaranteeing is contained in the garments. The current guarantee system is primarily designed to protect innocent retailers who are relying on information from manufacturers and other vendors. However, the fur products

labeling laws are primarily designed to ensure that the information received by consumers is accurate. If there is going to be a system where continuing guarantees are used, the guarantor should be required to state the type of fur contained in each garment style, and the retailer should only be able to rely on the information contained in that guarantee document in order to be exempt from liability.

The HSUS recommends that the FTC consider requiring that all guarantees—both separate guarantees, under 16 CFR 301.47, and continuing guarantees, under 16 CFR 301.48—specifically designate the type of fur contained in the fur products or furs guaranteed. This would ensure that retailers receiving furs from vendors with continuing guarantees know exactly where they need to go for the information they should rely on in generating new labels and advertisements, helping to reduce the risk that consumers would be unknowingly presented with mislabeled or deceptively advertised garments due to a disconnect between vendors and retailers.

Enforcement of the Fur Rules by the FTC

The fur rules are only as effective as enforcement by the FTC allows them to be. A number of the findings from the HSUS's investigations established violations of the FPLA and fur rules, irrespective of the *de minimis* value exemption that was recently eliminated—such as incidents where multiple labels, or where advertisements and labels, presented conflicting information about the fur content of a garment.

The HSUS submitted petitions to the FTC noting problems with industry compliance in 2007 and 2008, and to our organization's knowledge, no enforcement actions were brought. Subsequently, the HSUS filed a lawsuit under the District of Columbia's consumer protection laws regarding a portion of the investigative findings reported in its petitions to the FTC, which make violations of the FPLA and other federal laws *per se* violations of the D.C. law. A judgment was entered against one of the defendants, and settlement agreements were reached with four others.

The HSUS asks that the FTC ensure that the FPLA and the fur rules are diligently enforced, especially given evidence of recent non-compliance by some members of the industry. Further, the HSUS emphasizes that the FTC should actively enforce the FPLA and FTCA against *all* false and misleading representations concerning the content of fur and fur-trimmed garments, beyond ensuring that required information is included and accurate.[12] Any representation that is false or deceptive, such as efforts to mislead consumers into believing that certain fur garments are more environmentally friendly or more humane than others, when that is not in fact the case, should be prosecuted.

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[12] *See* 16 U.S.C. §§ 69b(1), 69c(a) (any label or advertising containing "any form of misrepresentation or deception, directly or by implication, with respect to such fur product" violates the FPLA).

Respectfully submitted,

Michael Markarian
Chief Operating Officer
The Humane Society of the United States

THE HUMANE SOCIETY
OF THE UNITED STATES

16 May 2011

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex O)
600 Pennsylvania Ave, NW.,
Washington, DC 20585

Re: Fur Rules Review Matter No. P074201

Dear Mr. Wilschire:

I am writing on behalf of the Humane Society of the United States with regards to the Fur Products Rules and Regulations. Thank you for the opportunity to comment on these policies. My remarks are primarily focused on the Fur Products Name Guide with particular emphasis placed on the species *Nyctereutes procyonoides*, commonly known as the raccoon dog.

The Use of Common Names in Science

While it is true that most biologists consider the scientific name of a species to be the definitive identifier for an organism, the use of standardized common names is becoming more prevalent. In fact, the American Ornithologist's Union, the American Fisheries Society, and the major North American herpetological societies maintain official lists of common names for species within their taxa of interest.[i,ii,iii] As scientists attempt to revise scientific names to reflect the evolutionary history of species, many of these names have undergone significant changes over the last decade.[iv] In fact, as these alterations in classification schemes become more widespread, many common names will outlast the scientific names of organisms.

The raccoon dog is a perfect example of how common names may remain the same while scientific names change. The scientific name for this species has been included in 2 different genera (*Canis* and *Nyctereutes*) and has changed 8 times.[v] Its common name "raccoon dog" has been used by scientists for well over a century.[vi] Today, the common name "raccoon dog", sometimes preceded by "Asiatic", "Japanese", or "Chinese", is the only common name used to refer to this animal in the scientific literature.[vii]

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Therefore, despite the fact that scientific names are considered the "official" designations for species in the scientific community, common names are oftentimes more enduring. Hence any changes to or misuse of common names in the scientific literature may be considered just as improper or misleading as utilizing an outdated or unaccepted scientific name.

Phylogenetic Position of Raccoon Dogs

Notwithstanding that the raccoon dog (*Nyctereutes procyonoides*) superficially resembles the raccoons (*Procyon lotor* and *P. cancrivorus*) that are native to the Americas, this species has always been recognized as a true canid. In fact, one of the first full descriptions of this species from 1838 clearly classifies it as a canid most closely resembling the Arctic fox based solely on its morphology.[viii] Modern phylogenetic studies utilizing diverse data sets of both morphological and molecular characters consistently place raccoon dogs in the canid family, typically nested among or close to foxes in the genus *Vulpes*. [ix,x,xi] It is also interesting to note that the Procyonidae, the group that contains raccoons and their relatives, are more closely related to the Mustelidae (weasels), Mephitidae (skunks), and even the Phocidae (seals) than they are to the Canidae. [ix,xii]

Introduced Populations of North American Raccoons

The use of the name "Asiatic raccoon" to refer to the species *Nyctereutes procyonoides* is problematic for another reason besides its taxonomic incongruity and complete absence in the scientific literature and English vernacular. The North American raccoon (*Procyon lotor*) lives in the wild as an introduced species in both Asia and parts of Europe. In fact, introduced populations of *P. lotor* have been reported in Russia, the Caucuses, Eastern Europe, and in Japan where it is considered an invasive species. [xiii,xiv,xv] Hence, it is both completely inaccurate and deceptive to refer to the raccoon dog as an "Asiatic raccoon" since the North American raccoon maintains free-living, wild populations in parts of Asia.

Once again, thank you for the opportunity to comment on these important regulations. If you have any questions or concerns with regards to these comments, you may contact Pierre Grzybowski of the Humane Society of the United States.

Sincerely,

Lauren Nolfo-Clements, PhD

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FUR-LABELING LAW STARTS TOMORROW

Better Business Bureau and the Master Furriers Guild Pledge to Aid Enforcement

Enforcement of the new fur labeling law, which goes into effect tomorrow, will be materially aided by the Better Business Bureau of New York, Inc., and the Master Furriers Guild. Both of the organizations pledged yesterday that they would take an active part to obtain adherence to the new regulations enacted to eliminate unfair trade practices and deceptive merchandising and advertising of fur coats.

Charles Gold, general counsel of the Master Furriers Guild of New York and the Master Furriers Guild of America, speaking at a meeting of fur retailers under the sponsorship of the Better Business Bureau in the Commodore Hotel, asserted that the Federal Trade Commission would find it difficult to examine and check advertising in all parts of the country. Appropriations for policing the law, he said, had been stricken from the final draft of the act.

Will Examine Advertising

"We will examine advertising of all kinds for truthfulness and compliance with the law," Mr. Gold said, "and we solicit the cooperation of nonmember firms. Where indicated, we will first call attention of the advertiser to the violation in question. Failing to receive cooperation, we shall furnish the information to the F. T. C., with all of the available supporting facts."

Hugh R. Jackson, president of the Better Business Bureau, said that his group would act as a "watchdog" for the commission and would be ready to receive complaints of both consumers and competitors. Offenders, he added, will be given an opportunity to voluntarily desist from illegal practices in selling fur garments, and if they disregard the request, the complaints will be turned over to the Federal Trade Commission.

The law requires labeling of all fur garments with the type of fur and the country of origin if the fur comes from a foreign country. Such terms as mink-dyed muskrat for muskrat coats, or coney for rabbit fur, or marten dyed skunk, for skunk, are prohibited.

The New York Times
Published: August 8, 1952

THE HUMANE SOCIETY OF THE UNITED STATES

Quick Reference Guide: Fur Investigation Results 2005 Through Fall/Winter 2007 (Updated March 19, 2008)

Sample	Purchase Date	Retailer	Designer / Brand	Advertised-Species	Label-Species	Test Results-Species	Label-Fur Origin	Label-Country of Manu.
1	Dec. 2006	Burlington Coat Factory	Calvin Klein		"Raccoon"	Raccoon Dog	"China"	"China"
2	Dec. 2006	Burlington Coat Factory	Baby Phat		"Coyote"	Raccoon Dog	"China"	"China"
3	Oct. 2006	J.C. Penney	a.n.a		"Raccoon"	Raccoon Dog	"China"	"China"
4	Dec. 2006	Burlington Coat Factory	Baby Phat	"faux fur"	"Racoon"	Raccoon Dog	"China"	"China"
5	Dec. 2006	Burlington Coat Factory	Baby Phat	"faux fur"	"Racoon"	Raccoon Dog	"China"	"China"
6	Dec. 2006	Burlington Coat Factory	Baby Phat	"faux fur"	"Coyote"	Coyote	"China"	"China"
7	Dec. 2006	Macys.com	Sean John	"faux fur"	"Raccoon"	Raccoon Dog	*Not on label*	"China"
8	Oct. 2005	Bloomingdale's	WEEKEND MaxMara		"Finni Raccon"	Raccoon Dog	"CINA"	"China"
9	Oct. 2005	Sak's Fifth Ave	Andrew Marc		"Raccoon"	Raccoon Dog	*Not on label*	"China"
10	Oct. 2005	Macy's	MICHAEL Michael Kors		"Raccoon"	Raccoon Dog	"China"	"China"
11	Dec. 2006	Dereon.com	House of Dereon	"raccoon"	"Raccoon"	Raccoon Dog	*Not on label*	"China"
12	May 2006	D.E.M.O	Rocawear		*No fur label*	Raccoon Dog	*No fur label*	"China"
13	Dec. 2006	Rocawear.com	Rocawear	"faux fur"	*No fur label*	Raccoon Dog	*No fur label*	"Vietnam"
14	Dec. 2006	Rocawear.com	Rocawear	"raccoon"	"Raccoon"	Raccoon Dog	*Not on label*	"China"
15	Dec. 2006	Ross	Calvin Klein		"Canis Latranis"	Raccoon Dog	"USA"	"China"
16	Jan. 2007	Lord & Taylor	DKNY		"Raccoon"	Raccoon Dog	"China"	"China"
17	Jan. 2007	Barneys.com	Spiewak	"fur"	"Coyote"	Wolf	*Not on label*	"USA"
18	Jan. 2007	Shoptommy.com (Tommy Hilfiger)	Tommy Hilfiger	"fake fur"	"Nylon Coyote"	Dog	*Not on label*	"China"
19	Jan. 2007	Nordstrom.com	Joie	"faux-fur"	*No fur label*	Dog	*No fur label*	"China"
20	Jan. 2007	Bluefly.com	MARC New York (Andrew Marc)	"faux fur"	*No fur label*	Dog	*No fur label*	"China"
21	Jan. 2007	BergdorfGoodman.com	Bogner	"rabbit"	"Asian Raccoon"	Raccoon Dog	*Not on label*	"China"
22	Jan. 2007	NeimanMarcus.com	Andrew Marc	"raccoon"	"Raccoon"	Raccoon Dog	"Finland"	"China"
23	Jan. 2007	Footlocker.com	Rocawear	"rabbit"	*No fur label*	Raccoon Dog	*No fur label*	"China"
24	Jan. 2007	Loehmann's (via Smartbargains.com)	OSCAR (Oscar de la Renta)	"raccoon"	*No fur label*	Raccoon Dog	*No fur label*	"China"
25	Jan. 2007	Dillards.com	MICHAEL Michael Kors	"raccoon"	"Raccoon"	Raccoon Dog	"China"	"China"
26	Dec. 2007	SaksFifthAvenue.com	Burberry	"faux fur"	*No fur label*	Rabbit	*No fur label*	"Ro-mania"
27	Nov. 2007	Neiman Marcus	Andrew Marc		"Trim: Polyester"	Raccoon Dog	*Not on label*	"China"
28	Nov. 2007	NeimanMarcus.com	Adam + Eve	"faux fur"	Rabbit	Rabbit	*Not on label*	"China"
29	Dec. 2007	Lord & Taylor	Marc New York		"Trim: Polyester"	Raccoon Dog and Rabbit	*Not on label*	"China"
30	Nov. 2007	Dillards.com	Preston & York	"faux-fur"	"Fox" and "Raccoon"	Raccoon	"USA"	"Guate-mala"
31	Nov. 2007	Yoox.com	Ramosport	"ecological ["fake"] fur"	"Raccoon"	Raccoon Dog	*Not on label*	*Not on label*
32	Sept. 2007	Bloomingdales.com	Aqua	"faux fur"	"Rabbit"	Rabbit	*Not on label*	"India"
33	Nov. 2007	Eluxury.com	Juicy Couture	"rabbit"	"Asiatic Raccoon"	Raccoon Dog	"China"	"China"

34	Nov. 2007	Dillards.com	Preston & York	"raccoon"	"Racoon"	Raccoon Dog	*Not on label*	"China"
35	Nov. 2007	DrJays.com	Azzuré	"fur"	*No fur label*	Raccoon Dog	*No fur label*	"China"
36	Nov. 2007	Cache.com	Caché	"Raccoon"	"Raccoon"	Raccoon Dog	*Not on label*	"China"
37	Nov. 2007	Bluefly.com	Pasha & Jo	"raccoon"	"Fox" and "Raccoon"	Arctic Fox	"China"	"China"
38	Sept. 2007	Sears.com	Excelled	"Fox"	*No fur label*	Raccoon	*No fur label*	"India"

For more information, including video of how raccoon dogs are skinned alive: www.humanesociety.org/furfree.

(Document updated March 19, 2008)

FUR-BEARING ANIMALS

IN NATURE AND IN COMMERCE

BY

HENRY POLAND, F.Z.S.

LONDON:
GURNEY & JACKSON, 1, PATERNOSTER ROW.
[*Successors to* MR. VAN VOORST.]
MDCCCXCII.

and the division between the fur and the long hair on the back is well marked, making a striking contrast; the tail is of a blackish colour.

There are not enough skins imported to give this fur the attention it deserves, and they are mostly made up into wrappers, the value of a skin being about 3s.

RACOON-LIKE DOG.

Canis procynides.

The skin of this animal is sometimes sold by importers under the name of Jackal, Badger, or Japanese Fox, and is sometimes sent to this country with the top hair removed, leaving only the soft under fur.

This animal has a very lively disposition. It is rather small, about a foot in length; the general colour is dark brownish-grey, and there is sometimes a dark mark across the shoulders like that of a Cross Fox; the under fur is abundant, soft, and of a light brownish-red colour, resembling the hue of a Red Fox, and the ground of this fur is dark; the ears are dark brown; over the eye there is a white stripe; the tail, which is rather short and not very bushy, is covered with dark brown fur, and also with longer bristly hairs, which are black; the tail is occasionally tipped with white; the legs are short. Sometimes there is a white spot in the dark fur, but this is rare.

The Racoon Dog is an inhabitant of China, Japan, and North-eastern Asia generally, and it is sometimes sold in captivity in Northern China. Most of the skins are exported from Japan, and chiefly from the port of Hiogo. In 1884 about 13,000 skins were imported, and

in 1891 about 70,000. The fur, both dyed and undyed, is manufactured into capes, trimmings, etc.

The value of a skin varies from 4d. to 7s. 6d., according to the quality and demand.

BAUM MARTEN, OR PINE MARTEN.

Mustela martes.

French: Martre de Prusse. German: Baum Marder, or Edel Marder.

The Pine or Baum Marten, although much rarer than in former years, still exists in Scotland, Ireland (Kerry County), North Wales (Carnarvonshire), and in some parts of England (Suffolk, North Devon, Cumberland, Lincolnshire). It appears to have been lately met with in Mid Hants, and it is believed to still exist in Epping Forest; it is also said to have been seen in Herefordshire as late as 1884. It is extensively found in Norway, Germany, Italy, Russia, Switzerland, rarely in Spain, and in other parts of Europe, and is usually to be met with in pine forests. Courland and Lithuania produce yearly about 3,000 skins. Its fur is rich and valuable, although much depreciated in price of late years; it is fine in texture, and soft to the touch. The value of a skin is about 10s.

The length of this animal is about 2 to 2½ feet, including the tail. The colour varies considerably from brown to dark brown, of a more or less yellow shade. The longer hairs are thicker on the back; the throat is covered with spots or patches of a more or less light colour. When the throat is very light, this Marten is sometimes confounded with the Stone Marten, but in

Petersen's
Fur Traders Lexicon

By
MARCUS PETERSEN
Author of
"The Fur Traders and Fur Bearing Animals"
"The Weasel Family"
"Seals, Their Products, Habits and Habitat,"
"What Is What In Furs," etc.

Published by
PETERSEN & CHANDLESS
6 West 37th Street
New York

RACCOON DOG. This animal, called **Tanuki** by the Japanese and **Kju Hao Tze** by the Chinese, is listed by different traders as the **Jap Fox, Sea Fox** and **Chinese Badger.** In spite of the fact that it approximates closely to the badger in its habits, it is really a dog, resembling the raccoon in appearance; and scientists have rightly classed it the **Raccoon Dog.** 150,000, of the skins marketed annually, come from China; 140,000, from Japan; and 30,000, from Korea; but they are all listed by American fur traders as **Jap Foxes.**

RACCOON FOX. (See Bassarisk).

RAM. Grown male of the sheep kind.

RASSE. This animal is also known as the **Lesser Civet** and the **Malacca Weasel.** It is widely distributed in China, India and the Malay Peninsula and the East Indian Islands. It secretes a perfume called Dedes by the Japanese.

RAT COYPU. (See Nutria.)

RATEL. This animal belongs to the Badger group of the Weasel family, and is found in India and Africa. It is also called the **Honey Badger,** because it digs up the earth with its long claws in search of the honeycombs of the wild bees.

RAGONDIN. French name for Nutria.

RATMUSQUE. French for Muskrat.

RATON. A name for Raccoons.

RATTI MUSCHIATI. Spanish for Muskrat.

RED CAT BEAR. (See Panda.)

RED LYNX. (See Caracal.)

RED SABLE. (See Kolinsky.)

RED SQUIRREL. The Chickaree.

RED TIGER. (See Puma.)

REINECKE. German for European Red Fox.

RENARD. French for Fox.

RENARD ARGENTI. French for Silver Fox.

RENNE. French for Reindeer.

RENO. Spanish for Reindeer.

PICTORIAL ENCYCLOPEDIA OF FURS

"FROM ANIMAL LAND TO FURTOWN"

---

by

Arthur Samet

Pen and Ink Illustrations
Sketched by Jules Halfant

Photographs of furs and skins
Selected by the Author

Combined Volumes I, II and III

Completely Revised
for 1950 Edition

Published in the interest of the advancement of fur knowledge

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(Book Division)
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America's First Picture Fur Book

ODDLY ENOUGH 1938
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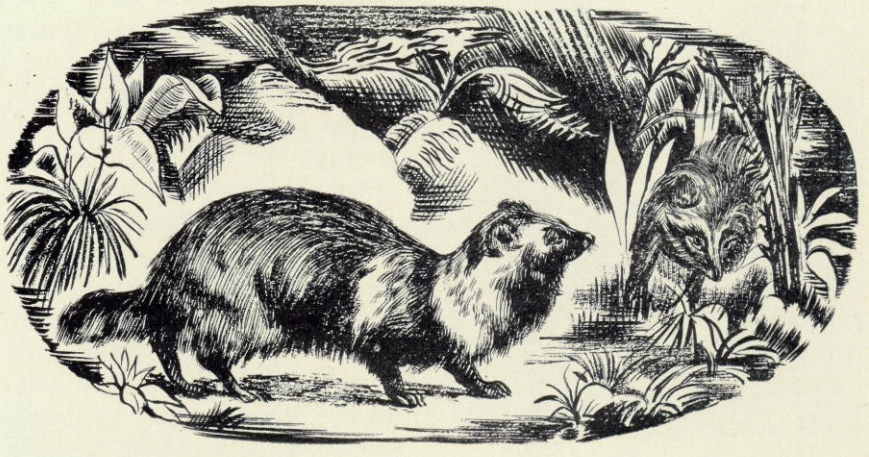
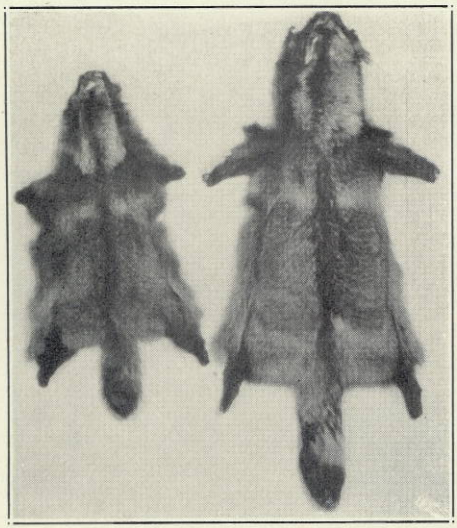
406 W. 31ST ST., NEW YORK 43

Is it Raccoon? Is It Fox? Is It Wolf? Is It Dog?



In the Islands of the Nipponese, in the vast lands of the Amur and Manchuria, in distant Shanghai, in the provinces of Korea dwells this fur bearer of many names. I have heard it called, in the role of fox, Jap fox, Jap cross fox, Chinese cross fox, raccoon fox, and at times Asiatic cross fox. In the role of wolf, it has the names of Jap wolf, Amur wolf, Jap cross wolf, Chinese wolf, and Chinese cross wolf. But the guise most popular is its debut as the Amur raccoon, Chinese raccoon, Asiatic raccoon, and the Mukden raccoon. Most likely the innocent beast would be proud to know it is named in so many roles in the great fur world. Let us add just one more important name, "Tanuki" from Japan.

With so many names there is good reason for confusion. In hair length the Manchurian variety reminds one of the long haired American raccoon. The tail is short and bushy somewhat like a wolf's, and bears a distant resemblance to a fox's. If you turn back to the American raccoon you will observe a ringed tail instead of a wolflike appendage. The coloring is divided between a dark yellow and a black, and the proportionate shading of each of these colors varies with the section of the world the skins come from. The black spots around the cheeks and eyes are very much like the raccoon's!



Small Skin of Central China *Large Skin of Manchuria*

The sides of the head and the flanks are yellowish with a sprinkle of the black shading. Through the back there is a mixture of black and yellow. The black coloring predominates in the grotzen. Note, in the smaller skin in the photograph the obvious cross toward the head, which is typical of a true fox. Skins of Japan (Tanuki) are silkier. The Manchurian and Amur skins run very large and long in hair. Central China produces medium and small skins. In Russia today, these Asiatic raccoons are being bred by the Soviets. Their aim is to produce skins as large as the Manchurian type and as silky as the Tanuki.

Are the Raccoons Going to The Dogs.

Our original question is still unanswered. Is this fur bearer, raccoon, fox, wolf or dog? As fur men we may resent the truth of zoölogical study which reveals this fur bearer as a "Dog". Yet because of its raccoon likeness, zoölogists call it the Raccoon Dog. Think not, however, that our Asiatic raccoons will go to the dogs. In spite of the fact that the fox and wolf and dog are all in one family of "dogs", the world's "Fur Trade" will continue to recognize the name of raccoon as the old standby. Thus, the Asiatic raccoon will not go to the dogs after all.

This book is a result of cooperation between the three main authors and SCIENTIFUR. The authors have been responsible for manuscripts, photos and proofs. SCIENTIFUR has financed the work and is responsible for layout, production and distribution.
Mostly the photographs are authors' but some are borrowed from other collections. An alphabetic list of persons contributing to the collection of pictures appears on page 263. Where other sources are used the origin is mentioned alongside the figures or tables. The English translation is by Outi Lohi and corrected by Michael Mansbridge.
I wish to express my thanks to the authors and the printers for their excellent cooperation

Gunnar Jørgensen

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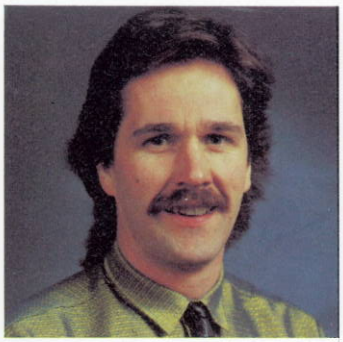

Einar J. Einarsson

Outi Lohi

Authors

Nils Norodd Nes

Norodd Nes was born in 1915 in North-Aurdal, Norway. After attending the Agricultural School he was educated at the Norwegian College of Veterinary Medicine and studied genetics and animal husbandry at The University of Edinburgh. After some years as a veterinary surgeon he was appointed assistant professor at the Institute of Animal Husbandry and Genetics, The Veterinary College of Norway. In 1967 he was appointed full professor in Genetics and Animal Husbandry.
Nes has lectured on genetic diseases, general and special genetics and animal husbandry. As a fox farmer in his early age Nes aquired a special interest in fur animal genetics and fur farming, and has taught these subjects for 30 years. He accomplished his thesis on mink and has written a number of scientific and popular articles, most of them dealing with genetics of fur-bearing animals.

Einar J. Einarsson

Einarsson was born in Iceland, but is now settled in Norway.
He is educated at The Agricultural College of Norway (NLH) majoring in animal breeding. Further education in population genetics, statistics, reproduction and biotechnology, including several Inter-Nordic Doctoral Courses.
He is author of a large number of publications, scientific as well as more practical ones. Einarsson is a popular lecturer within fur farming and genetics, in national as well as in international meetings.
After seven years as assistant professor at The Institute of Poultry and Fur-bearing Animals, he was appointed manager of Department for Genetical Research and Consultation in The Norwegian Fur Breeders Association in 1985. Besides working on the qualitative genetics, his main field has been the quantitative genetics, especially developing and organizing a selection and breeding program for fur-bearing animals in Norway.

Outi Lohi

Outi Lohi was born in Finland and aquired the Master of Science in agriculture at The University of Helsinki in 1958.
She learned fur ranching in practise on a fur farm in England in 1962. After working a few years in agricultural planning and farm management she started as a consultant in The Finnish Fur Breeders Association in 1965. After 4 years in advisory service she then specialized more in research, first in feeding and animal husbandry but later on in genetics and breeding especially.
In 1982 she moved over to The Danish Fur Breeders Association to take over similar responsibilities. In 1985 Outi Lohi was appointed scientist responsible for genetic, breeding and reproduction research at The Fur Animal Department of The National Institute of Animal Science in Denmark.
Outi Lohi is author of a number of publications and has since 1975 been the president of The committee for breeding, Fur Animal Division in The Scandinavian Association of Agricultural Scientists.

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Reinhard Scheelje

Ph. D., adviser and director of the secreteriat of the West German Fur Breeders Association (Zentralverband Deutscher Pelztierzüchter e.V.). Editor of the journal Der Deutsche Pelztierzüchter and author of a number of books and articles on fur animals.

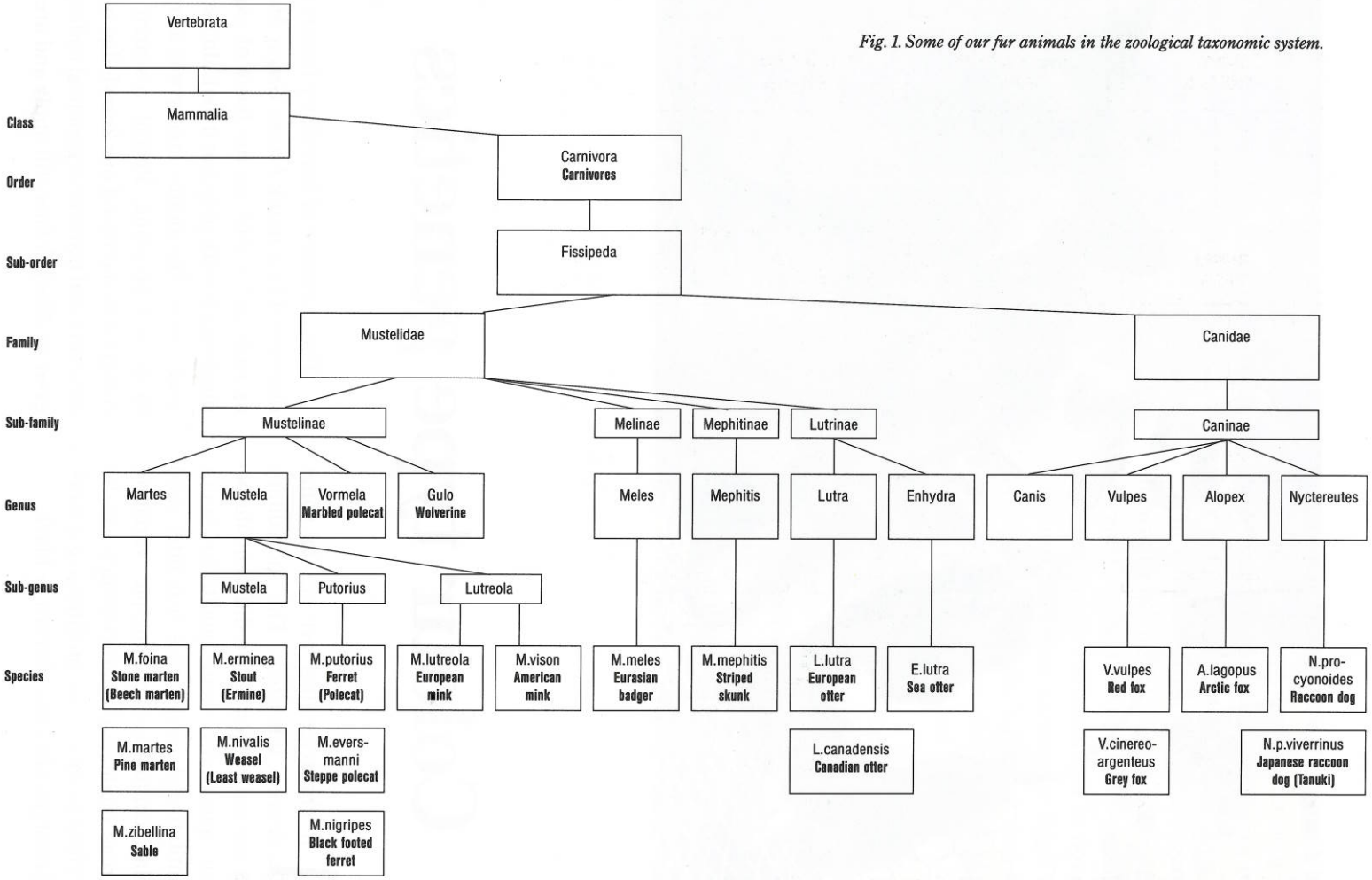

Fig. 1. Some of our fur animals in the zoological taxonomic system.

Raccoon dog

Raccoon dog in Europe *Nyctereutes procyonoides*

The raccoon dog belongs taxonomically to the family *Canidae*. The species originates from east Asia *(Mäkinen, 1978)*. It was hardly known elsewhere before the year 1927, but between then and 1957 about 9000 individuals were purposely introduced to different parts of European Russia and western Asia.

Introductions to new environments were not always equally successful but in east Karelia near the Finnish borderline the animals managed to settle down well. They increased in numbers and soon spread their territory westwards. Thus these animals, transferred by Russians, and their progeny form the base for both the wild and the domesticated populations in Nordic countries. In the 1930:s the animals had already invaded east and south Finland but were still fairly rare in the beginning of 1960:s.

A new invasion from the Russian part of Karelia increased the population in the late 1960:s and in the beginning of 1970:s and since then the raccoon dog has been a natural habitant in the Finnish fauna in east-, south- and middle-Finland.

The population is more scattered in south-western and western Finland but occasionally it has been caught even in Lapland *(Nowak, 1984)*.

A few individuals were caught in Sweden near the Finnish border in the 1940:s *(Bjärvall & Ullström, 1986)* but today dispersed findings are reported from several parts of the country even far south. Some individuals have even been detected in Finmark in nothern Norway *(Gjerde, 1984)*.

From the southern parts of Russia the species has slowly spread towards central Europe. Since 1955 it has become more and more common in Poland and in 1963 a density of 20 animals per 1000 hectares is reported *(Nowak, 1984)*. It is also known in East Germany, Czechoslovakia and Rumania. Occasionally, it has been caught also in West Germany even near the Danish and French borders.

The raccoon dog has old traditions even as a farm animal. Growing raccoon dogs in captivity obviously took place already long ago in the Far East. At the beginning of the

20th century there were several state supported farms in Japan *(Valtonen, 1986)*. In Russia the farming was commenced as early as 1928 and in 1934 fifteen state farms are mentioned producing mainly raccoon dogs *(Metiäinen, 1943)*. At this time breeding animals were also exported to Germany where a number of 1200 domesticated raccoon dogs were reported in 1937 *(Schmidt, 1973)*. Unfortunately, some kind of incurable disease occurred on the farms and the whole domesticated population was extinguished in 1937.

Some attempts for domestication were obviously made this early also in Sweden *(Metiäinen, 1943)* and in Finland where advertisements for breeding animals can be found in the Fur Breeders magazine. How serious these experiments were is not known. However, a permanent farm production of raccoon dogs did not exist in Finland before 1970:s. At this time the long haired furs in general were in fashion and the increasing wild population helped make the fur farmers interested in this animal. The first litter in captivity was born on *Mauno Yrjänä's* farm in Lohtaja and a year later research with raccoon dogs was started on the research farm in Kirkkonummi. Reproduction with the first breeding stock was seldom good but increased year by year as more domesticated breeding animals were available.

The pelt prices have varied rapidly and this has also caused fluctuation in the interest into raccoon dog farming.

The biggest producers are Finland where the main production is farm animals and the Soviet Union where obviously the main part is wild furs. Some farm production is also found in Denmark and in the east European countries. A few breeding animals have even been exported to the U.S.A.

The wild raccoon dog lives in forest areas, often by the sea or rivers (Fig. 183). It is therefore sometimes also called "sea fox" (Seefuchs). The animals move mostly during the night. (From this the latin name *nyctereutes)*. It is also a social animal and several individuals can be found in the same sleeping place.

The feeding habits are fairly modest. The teeth differ from a typical carnivorous structure and are suited to dealing with vegetable materials as well. It is generally peaceful and feeds mostly on small rodents, bird's eggs, insects and even accepts berries and grains. In coastal areas it also catches fish.

When in wild in cold climate the raccoon dog hibernates. Therefore the appetite is enormous in the autumn and the animals try to gather a layer of depot fat. Among the domesticated ones the activity is reduced about 20 % but total hibernating seldom occurs.

The breeding season is from early February to late April. The female has only one heat period per season. In the wild the raccoon dog is often monogamous and lives in pairs from early autumn even after the pups are born. In captivity, however, it has been adapted to polygamous mating. Proestrus can be fairly long from 2 to 14 days, oestrus usually 3-4 days. The gestation period lasts 59 to 64 days. The litter size varies from 1 to 10, and sometimes even more. The average among domesticated animals is 6-7 pups per litter. The new-born pups weigh about 60-110 grammes The eyes are opened in 9 to 10 days. The lactation lasts $1^1/_2$-2 months but

Fig. 183. Raccoon dog in the wild.

already in 3 to 4 weeks they begin to take other kinds of feed. The young ones reach maturity in 8 to 10 months.

The adult raccoon dog is about 55 to 80 cm long, the tail adding 15-25 cm to that. The shoulder hight is 30-35 cm, the body weight 4-6 kg in the summer and 5 to 10 kg in the winter with approximately 30-35 % depot fat. The thick winter coat though makes the animal look much bigger.

The chromosome number in the European raccoon dog is 2n=54 + up to 4 B chromosomes *(Mäkinen et al., 1986).*

Schmidt (1973) has reported that mutant colour types existed in Germany already in the 1930:s. Unfortunately also these animals were pelted in 1937 in fear of the unknown disease which had appeared on the raccoon dog farms. He mentions that white, black, cross patterned and other colour types already existed at that time.

Standard raccoon dog

The wild type of raccoon dog has a greyish brown underfur with guard hairs varying

Fig. 184. Standard raccoon dog.

from yellow to black.The general colour of the pelt can vary from very dark to fairly reddish or yellowish brown or light. The colour depends mostly on the colour of the guard hair even though the underfur to some extent always follows the guard hair. The standard is an *agouti type.* The guard hairs can have light (silver), yellow or dark zones. The regular light bars often give a striped appearance to the pelt. (Fig. 184).

The legs are dark. The face is pale around the pigmented nose, but dark , often almost black around the eyes and on the cheeks, silvery on the forehead. Thus the face closely resembles the American raccoon *(Procyon lotor),* which obviously is the reason for the name raccoon dog. The colouring of the tail, however, makes a clear difference between these two animals. The cross stripes are lacking on the raccoon dog tail.

The winter coat is thick and long haired thus forming a good protection from the cold. The long guard hairs can be up to 120 mm long. The short guard hairs are numerous but disappear in the layer of underfur. The density of underfur is in August over 2000 hairs per one cm^2, in October over 6000 and in December over 9000 hairs per one cm^2. The winter coat is ready in November-December. The moulting of underfur starts in February-March and is finished in June when even the old guard hair starts loosening.

Colour mutants

Motley raccoon dog. Even in the standard type lighter patches can appear on the shoulders. These are generally more or less symmetrical and never very extreme.

In 1977 and 1978 irregularly motly individuals appeared on several farms in east Finland. In some cases the light patches were small but sometimes almost the whole body was white and only the head dark (Fig. 185).

The farmers' impression was that the spots were inherited like a dominant characteristic but because the types did not seem to interest the fur buyers their inheritance was

Fig. 185. Occasionally variegated or spotted individuals turn up on raccoon dog farms.

never properly investigated. Some motley pelts, however, have occasionally turned up since then.

White raccoon dog (Ww) *Schmidt (1973)* reports about a completely white mutant of the raccoon dog, which according to him was not an albino. A similar type was found in 1976 in Finland *(Katajamäki et al., 1984).*

Both the guard hairs and the underfur are completely white but the eyes and the nose are pigmented (Fig. 186). Therefore the colour type is obviously not due to an albino gene. The white colour is proved to be result of a dominant gene. In the Scandinavian system it has been given the symbol W.

The mating white x standard gives 50 % standard and 50 % white. No homozygous individuals are known so far and the litter size in matings white x white compared to white x standard gives reason to believe that a lethal factor is connected to this gene and causes the death of the individuals homozygous for this factor.

Japanese raccoon dog/Tanuki

Nyctereutes procyonoides viverrinus

Today in the eastern parts of Asia the raccoon dog is found in Japan, east Siberia, China and Korea. There are small differences in the shade of the colour and in the hair type between local populations but they all obviously belong to the same species.

Even though the European raccoon dog according to literature also originates from east Asia the Japanese species and the European one are not identical. Not much difference can be found in the phenotype but the number of chromosomes in the Japanese raccoon dog is 2n=38 + 2-5 B chromosomes *(Mäkinen et al., 1986).* However, similarities between the chromosomes of these two species are found to such a degree that hybridization is probably possible.

Fig. 186. White raccoon dog is a dominant type. Mother with four pups.

WARNING
This report contains images that some people may find distressing

FUN FUR?

A report on the Chinese fur industry

Hsieh-Yi, Yi-Chiao, Yu Fu, Mark Rissi and Dr Barbara Maas

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FUN FUR?

A report on the Chinese fur industry

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Executive summary

This is the first ever report from inside China's fur farms. It is based on field and desk research carried out in 2004 and January 2005. Several farms in Hebei Province were visited as part of this field research. Numbers of animals held at these facilities ranged from 50 to 6000. The report provides background information on the Chinese fur industry and describes and documents husbandry and slaughter practices. It goes on to place China's role as the world's largest exporter of fur garments into a global context, which involves direct links to the EU and the UK. It ends in a set of urgent recommendations for national and international policy makers, as well as members of the British and European public.

For at least ten years, the international fur industry has waged a coordinated, well funded and slick global PR campaign aimed at dispelling the moral stigma attached to wearing fur. Mixing fur with silk, wool, suede and leather, employing new manufacturing processes such as shearing and knitting, as well as new fashionable colours, have added novelty and versatility to fur. Steadily increasing marketing of fur accessories and clothing and footwear with fur trim (e.g. as collars, scarves or on hoods) has almost imperceptibly brought fur back onto the streets. Targeting a younger and fashion conscious market, fur is now included in anything from evening wear to sports wear and haute couture to ready-to-wear mass produced affordable garments.

Worldwide fur sales totalled some US$11 billion in 2001/02. The European Union is the world's biggest consumer of fur, with EU sales having increased sharply since the mid-1990s. EU sales of full fur products and fur trim in 2002/2003 are estimated at US$4.525 million.

Although fur farming has been banned in the UK, London is the world centre for fur buyers. The 45 members of the British Fur Trade Association or BFTA, itself part of the International Fur Trade Federation (IFTF), represents retailers, traders, wholesalers and manufacturers. Collectively BFTA members buy the majority of the world's fur at primary level, which is to say as pelts. In doing so, they turn over some £500 million a year.

Eighty five percent of the world's fur originates from farms. China, also a member of the IFTF, is the world's largest exporter of fur clothing and according to industry sources, the biggest fur trade production and processing base in the world. Between 25% and 30% of the country's fur is obtained from wild animals, while 70-75% originate from captive animals. China is also one of the few countries in the world without any legal provisions for animal welfare.

Most Chinese fur farms were established during the past ten years. Wild species bred for fur include red and Arctic foxes, raccoon dogs, mink, and Rex rabbits. According to Chinese fur industry sources, a growing number of international fur traders, processors and fashion designers have gradually shifted their business to China, where cheap labour and the absence of restrictive regulations make life easier and profit margins broader.

The international fur sector is complex, with pelts produced by farmers passing through several countries and undergoing various processes before it reaches the final consumer.

Chinese Customs statistics indicate a net volume of fur imports and exports for 2003 of US$997.6 million, up 42.5% from 2002. More than 95% of fur clothing produced in China is sold to overseas markets, with 80% of fur exports from Hong Kong destined for Europe, the USA and Japan. The country's expanding product range includes pelts, full coats, fur accessories, such as scarves and hats etc., toys, garment trimmings and even furniture. A random market survey in boutiques and department stores in Switzerland and London discovered fur garments labelled "Made in China" among top fashion brands.

In the UK, fur farming has been banned on humanitarian grounds. In all farms visited in China, animals were handled roughly and were confined to rows of inappropriate, small wire cages, which fall way short of EU regulations. Signs of extreme anxiety and pathological behaviours were prominent throughout. Other indicators of poor welfare include high cub mortality, self-mutilation and infanticide.

Between November and December, foxes are sold, slaughtered, skinned and their fur is processed. Animals are often slaughtered adjacent to wholesale markets, where farmers bring their animals for trade and large companies come to buy stocks. To get there, animals are often transported over large distances and under horrendous conditions before being slaughtered. They are stunned with repeated blows to the head or swung against the ground. Skinning begins with a knife at the rear of the belly whilst the animal is lying on its back or hung up-side-down by its hind legs from a hook. A significant number of animals remain fully conscious during this process. Helpless, they struggle and try to defend themselves to the very end. Even after their skin has been stripped off, breathing, heart beat, directional body and eyelid movements were evident for 5 to 10 minutes.

This report shows that China's colossal fur industry routinely subjects animals to housing, husbandry, transport and slaughter practices that are unacceptable from a veterinary, animal welfare and moral point of view. Housing, husbandry, transport and slaughter conditions fall drastically short of EU, UK and Swiss legislation.

We therefore urgently appeal to:

- Fashion designers to shun the use of fur in their collections and use non-violent materials instead
- Shoppers not to buy fur garments or accessories or clothes with fur trimmings
- Shoppers to check whether designers incorporate fur in their collections
- Fashion retailers not to stock garments or accessories or clothes with fur trimmings
- EU member states and the European Parliament to ban the import of fur from China and of garments that contain such fur
- Chinese government to urgently introduce and enforce legislation prohibiting the skinning of live animals
- Chinese government to urgently introduce and enforce legislation prohibiting inhumane treatment and slaughter methods
- Chinese government to introduce and enforce legislation prohibiting the inhumane confinement of animals

A comprehensive selection of photographs and video footage is available from Care for the Wild International (© Swiss Animal Protection/EAST International).

1. Introduction

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“Fur is back. For good. Previously a luxury, it’s everywhere this winter.”

Elle France, 2 December 2002

"Real Fur Is Fun Again", extols the headline of a recent article in the magazine Newsweek.[1] This is music to the ears of fur industry representatives. For about a decade they have waged a coordinated, well funded and slick global PR campaign aimed at dispelling the moral stigma attached to wearing fur. Together with its national members, the International Fur Trade Federation (IFTF) has been working overtime courting top designers, fashion houses and women's magazines, tempting fashion students with fur fashion design competitions and targeting a much broader range of potential consumers with inventive spin about freedom of choice and independent thinking. And it has paid off. Mixing fur with silk, wool, suede and leather, new manufacturing processes such as shearing and knitting, as well as fashionable new colours, have added novelty and versatility to fur. Steadily increasing marketing of fur accessories and clothing and footwear with fur trim (e.g. as collars, scarves or on hoods) has almost imperceptibly brought fur back onto the streets. From evening wear to sports wear and haute couture to ready-to-wear mass produced affordable garments; fur has made a fashionable come back. According to the Fur Commission USA, "*once again for 2003/2004 retailers reported that the average age of the fur buyer continues to decline with 55.3% of today's fur customers under the age of 44.*"[2] Those who still can't help wondering about the animals whose skin has become a trendy wardrobe filler are offered assurances. "*Farming and wearing fur harms nobody*" says Richard D. North of the Institute of Economic Affairs.[3] Fur, we are to believe, is not only hip and luxurious, sexy and fun, it stems from well cared for, purpose bred, happy animals who lead contented lives on fur "farms" and "ranches". When their time comes they are humanely 'harvested' or “euthanased” to provide today's young, intelligent, professional woman, who knows what she wants, with stylish "city chic".

Founded in 1949, the International Fur Trade Federation (IFTF) is today comprised of 35 member associations and organisations from 29 countries. It claims to include practically every fur producer and fur consuming country in the world.[4] According to information posted on the internet, the IFTF seeks to protect fur trade interests, promote innovation, high standards and a positive factual image of fur and the fur industry worldwide whilst, at the same time, being "*dedicated to the conservation and welfare of all fur-bearing animals*". [5]

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Worldwide fur sales totalled some US$11 billion in 2001/02.[6] Perhaps surprisingly, the European Union is the world's biggest consumer of fur, with EU sales increasing sharply since the mid-1990s. Sales of full fur products and fur trim in 2002/2003 are estimated at US$4.525 million.[7] A staggering 35.5 million pelts were produced in 2002.[8] In the same year, 40,000 fur sector enterprises were based in the EU.[7]

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It may also come as a surprise that, while fur farming has been banned in the UK, London is the world centre for fur buyers.[9] Part of the IFTF, the 45 members of the British Fur Trade Association, or BFTA, represent retailers, traders, wholesalers and manufacturers. Collectively, BFTA members buy the majority of the world's fur at primary level, which is to say as pelts. In doing so, they turn over some £500 million a year.[10] By the 1999/2000 season, UK sales of fur including fur trims had increased tenfold compared to 1985.[11] UK industry figures report a 35% rise in sales of fur, fur trim and fur accessories from 2002 to 2003.[12] Isabel Oakeshott, Political Correspondent for the Evening Standard, noted that "*More than £40 million of fur-related items poured into Britain last year - almost double the amount of five years ago. Imports of clothes and fashion accessories made with real fur have tripled from £4 million to about £12 million in the past decade. As well as fur clothes, more than £6 million of raw fur and £22 million of tanned or dressed fur, from 12 named species and 'other animals', was shipped into Britain last year.*" [13]

Eighty five percent of the world's fur originates from farms.[14] China, also a member of the IFTF, is the world's largest exporter of fur clothing and according to industry sources, the biggest fur trade production and processing base in the world.[8] It is

also a country without any legal provisions for animal welfare and a correspondingly poor track record. So we set out to examine the situation on the ground. What we found has shocked even the most seasoned campaigners. Our investigators uncovered and documented unimaginable acts of systematic brutality and animal cruelty on a colossal scale, which are the subject of this report.

This is the first ever report from inside China's fur farms. Based on field and desk research carried out in 2004 and January 2005, it provides background information on the Chinese fur industry and describes and documents husbandry and slaughter practices. The report goes on to place China's role as the world's largest exporter of fur garments into a global context, which involves direct links to the EU and the UK. It ends in a set of urgent recommendations for national and international policy makers, as well as members of the British and European public. The report focuses on Hebei Province, one of China's major fur trade centres. However, the conditions encountered there are representative of fur farming operations throughout China. A comprehensive selection of photographs and video footage is available from Care for the Wild International (© Swiss Animal Protection/EAST International).

2. Fur Farming in China

A Finnish fur industry report recently pointed out the difficulties of obtaining accurate fur trade statistics for China.[15] It concluded that, whilst a detailed assessment of China's fur industry is therefore impossible, there is no doubt that China has become the biggest fur trade production and processing base in the world.


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Most Chinese fur farms were established during the past ten years. Species bred for fur include red and Arctic foxes, raccoon dogs, mink, and Rex rabbits. According to Chinese fur industry sources, a growing number of international fur traders, processors and fashion designers have gradually shifted their business to China, where cheap labour and the absence of restrictive welfare regulations make life easier and profit margins wider. According to a Korean fox farmer, Canada tried to exploit cheap labour in China and in the early 1990s exported 200 breeding foxes there.[16]

Chinese Fur Trade Association statistics state that between 25% and 30% of the country's fur is obtained from wild animals, while 70-75% originates from captive animals. Fur markets and trade centres continue to mushroom, accompanied by an upsurge of companies dealing in all manner of fur, pelts, trimmings, garments and other relevant products and services. One major wholesale and retail market was reportedly involved in trading more than 1,800,000 fur coats, 1,500,000 pieces of pelt and 2,000,000 trimmings in 2000 alone[17] - the equivalent of nearly US$200,000,000 and only a fraction of the overall volume of fur traded in China.

Commercial fox farming in China began in 1860. As fur farming expanded into a major industry in the West, China began to follow suit by the mid 1950s. From 1956, breeding foxes for fur became more widespread. At the time, some 200,000 foxes were added to the country's fur farms each year. Collectively they churned out more than a million skins a year. As China began to open up commercially between the 1980s and 90s, the country's fur industry boomed. Next to traditional state-run farms, private and family run farms started to spring up. During the 1990s, the sector attracted foreign investments, which lead to the establishment of even more fur farms. To date, Chinese fur farmers hold more than 1.5 million foxes and an estimated equal number of raccoon dogs.[4]

3. Major Farming Areas

According to Chinese industry sources, fur farms in Shandong Province, situated in the country's North-East, hold the highest number of animals, including more than 500,000 foxes. Next up is Heilongjiang Province, where over 300,000 foxes are held for their fur. The number of foxes on farms in Jilin Province too exceeds the 300,000 mark and continues to rise.[18]

While fur farms are also present in Hebei Province, this part of China primarily acts as one of the country's main hubs for wholesale and retail markets. Some of the animals bred in Shangdong Province are sold and transported to Hebei to be slaughtered and skinned. Liou Shih in Li County and Shan Cuen in Su Lian County, both in Hebei Province, are China's biggest fur wholesale and retail markets.[19] Liou Shih market deals mainly in raw cow hides and sheep skins, commonly known as "rough fur", while the market in Shan Cuen specialises in mink, fox, Rex rabbits and raccoon dog skins, collectively referred to as "fine fur".

4. Scale of Farming Operations

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Small fur farms are often run as family businesses. Mid size farms retain between 10 and 15 workers, while larger facilities employ from fifty to several hundred workers. Farms and fur trade related businesses in Shangdon and Heilongjiang Provinces are the biggest and most efficient in China. With animal numbers ranging from 1,000 to more than 10,000 per farm, many have been the recipients of overseas investments. One of the largest farms holds more than 15,000 foxes and 6,000 mink.[20] Operating as a multi-functional enterprise, it incorporates artificial insemination, breeding, slaughtering, pelt-processing, tanning, and post-production facilities. It is also engaged in export to other countries.

In Hebei Province, many fox farms have set up shop in the vicinity of cities and towns such as Tanshang City, Laoting County, Li County and Bao Shu City. The majority of these farms are run by private individuals. Animals generally number from under one hundred to several hundreds. The biggest farm in this province holds more than 20,000 animals.[21] Smaller farms focus mainly on breeding and then sell their foxes to wholesale markets or slaughter houses. Skins are then passed to the next tier of fur traders and processors for further treatment and post-production.

Several farms in Hebei Province were visited as part of the field research for this report. Numbers of animals held at these facilities ranged from 50 to 6000. Some farms mainly keep foxes, but the majority also hold other species such as mink, raccoon dogs, and Rex rabbits.

Fox species commonly kept include different colour morphs of Arctic (*Alopex lagopus*) (white and blue fox) and red foxes (*Vulpes vulpes*) (red and silver fox). Fur farmers are said to mostly use artificial insemination to crossbreed blue and silver foxes, as their natural mating periods do not coincide. Industry figures estimate that China produces over 1 million mink and fox skins each year – the equivalent of 11% of the world's mink and 27% of the world's fox production[7].

Many farms are facing inbreeding related problems, which lead to a gradual deterioration of fur quality. One farmer claimed that, as a result, Chinese farmers import fresh blue fox breeding stock from Finland to improve the quality of their pelts. According to a Finnish television report, Finland exported two million animals to fur farms in China in May 1998.[16] Heilongjiang Province has also seen the establishment of a fox farm that specialises solely in breeding. One farm owner stated that similar enterprises are soon to be initiated in Hebei as well. Other fur related business ventures include selling Finnish blue fox sperm and instruction in artificial insemination techniques.

5. Products and Prices

The Chinese fur industry's expanding product range includes pelts, full coats, accessories, such as scarves and hats etc., as well as garment trimmings, combination garments, toys and even furniture.

Shop workers explained that price depends on the design and size of a garment as well as the amount, species and quality of the fur used. Almost all shops keepers maintained that their furs were imported from the USA or Finland. This reflects the widely held belief that domestically produced fur has yet to meet top quality standards. Locally produced fur is therefore intentionally mislabelled with foreign manufacturer's marks to achieve higher prices.

Live foxes are sold for between US$50 - 75 per individual. However, the price of live animals and pelts varies from year to year. Chinese department stores typically sell a good fur coat for between US$3,750 to US$5,000, while some top of the range coats retail for as much as US$12,500. Prices at retail and market stalls are lower, ranging from US$1,250 to US$2,500.

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6. Export

The international fur sector is complex, with pelts produced by farmers passing through several countries and undergoing various processes before reaching the final consumer.[7] The IFTF recognises China as the world's largest exporter of fur. More than 95% of fur clothing produced in China is sold to overseas markets, including Europe, the

USA, Japan, Korea and Russia, with 80% of fur exports from Hong Kong destined for Europe, the USA and Japan. Products include fur, fur garments and fabric or leather garments with fur trim. Chinese Customs statistics indicate a net volume of fur imports and exports of US$997.6 million in 2003, up 42.5% from 2002[22]. China has also become the leading fur garment exporter to the USA, accounting for 40% of total US fur imports in 2004 – the equivalent of US$7.9 million.[23] Exact export statistics, however, are difficult to obtain, as fur trimmings are not specifically declared to customs. Furthermore, retailers can import stock which is then re-exported to another country.

Most retailers are unwilling to declare the true origin of their garments in an effort to avoid the image of cheap production and inferior quality. Any fashion retailer can legally import textiles from China without having to declare their origin. If it is mentioned at all, the final label may only read “Made in Italy” or “Made in France”, for example. Most retailers do not even identify the type of fur used for trimmings. However a random market survey in boutiques and department stores in Switzerland and London discovered fur garments labelled “Made in China” among top fashion brands.

Internationally, the overall economic importance of the classic furrier has become greatly diminished during the past ten years. In many countries, their relative contribution to revenue generated from fur garment sales has become all but irrelevant. In January 2005, the Sandy Parker report stated that “traditional furriers must recognise that a share of at least their potential market has now been taken away by non-fur retailers. Thus, while their own sales may have remained steady or increased marginally, furs sold by department and speciality stores, including boutiques, are up substantially and may account for the bulk of the increases that were registered in the past two years. Similarly, any decline in sales by fur stores and departments may not necessarily signify a general decline in demand for fur, but possibly that fur customers are finding what they want elsewhere.” [24]

7. On the Farm

Red foxes (*Vulpes vulpes*) weigh 5.2-5.9kg with a head-body length of 66–68cm. Arctic foxes (*Alopex lagopus*) have a head-body length of 53-55cm and an average body weight of 3.1-3.8kg. Raccoon dogs (*Nyctereutes procyonoides*), an Asian fox-like canid, weigh between 2.5 and 6.25kg with an average body length of 56.7cm in Japan, and 51.5-70.5cm and 3.1-12.4kg for Finnish raccoon dogs.[25]

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“Fur farming is well regulated and operates within the highest standards of care.”

International Fur Trade Federation[8]

On Chinese fur farms, foxes and raccoon dogs are confined in rows of wire mesh cages (3.5 x 4cm mesh) measuring around 90(L) x 70(W) x 60(H) cm, although some are far smaller. The cages are raised off the ground by 40–50cm, contain no furnishings, nest boxes, and in many cases, no cover. Each cage houses one or two animals. Cages housing breeding females link to brick enclosures intended to offer females a degree of seclusion during birth and cub rearing to reduce cub mortality, e.g. through infanticide or maternal neglect.

Mating takes place from January to April. The majority of farms use artificial insemination, especially to cross-breed blue and silver foxes, whose mating periods do not coincide. Foxes reach sexual maturity after 10-11 months. Breeding animals are used for five to seven years. Farm owners state that vixens produce average litters of 10-15 cubs a year between May and June.[i] Cubs are born in spring and weaned after three months. According to farm owners, average cub survival rate is 50% to weaning. This means that farmers gain around five to seven cubs per litter. Cubs are usually slaughtered after a further six months, once they have undergone their first winter moult. Farmers retain some animals as breeding stock, but most animals are sold at the end of each year.

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Pathological behaviours, which indicate significant welfare problems, such as extreme stereotypic behaviour[ii], severe fearfulness, learned helplessness (unresponsiveness and extreme inactivity) and self mutilation, were observed on all farms. Farmers also reported breeding difficulties and infanticide, which have also been associated with poor welfare in these and other species. Farmers handle foxes by first removing them from their cage with iron tongs that clamp around the neck and then grabbing them by the tail. Two types of tongs are used. Subsequent handling usually involves holding the animals upside down by their hind legs.

The rearing season extends from June to December. Once animals are selected for fur production as opposed to breeding, the quality of their fur is the farmers’ sole concern. Before animals are ready for slaughter, farmers examine the maturity and quality of their fur. Between November and December, foxes are sold, slaughtered, skinned and their fur is processed.

[i] It is assumed that this figure refers to average litter sizes across the two fox species, including crossbreeds, as well as raccoon dogs.

[ii] Stereotypies are repetitive, invariant behaviour patterns that serve no apparent function.[46] These behaviours are frequently seen in captive animals, particularly those housed in sterile, restrictive environments, and in carnivores typically take the form of pacing back and forth.

8. Slaughter

Animals are slaughtered adjacent to wholesale markets, where farmers bring their animals for sale and large companies come to buy stock. To get there, animals are often transported over large distances and under terrible conditions before being slaughtered.

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"Farming and wearing fur harms nobody."

Richard D North, Institute of Economic Affairs, quoted by British Fur Trade Association[3]

Workers extract animals from their cages using a capture pole with a noose at the end. Sometimes the animals are held suspended by their necks for some time and carried around. Workers then grab the animal by its hind legs and, using a metal or wooden stick, repeatedly strike the fox, raccoon dog or mink on the head. Alternatively, they may swing it head-first against the ground. These actions are intended to stun the animal. The animals struggle or convulse and lie trembling or barely moving on the ground. The worker then stands by to watch whether the animal remains more or less immobile.

Many, whilst immobile, remain alive. Skinning begins with a knife at the rear of the belly whilst the animal lies on its back or is hung upside-down by its hind legs from a hook. In one case, this took place next to a truck which collected the carcasses - for human consumption. Starting from the hind legs, workers then wrench the animal's skin from its suspended body, until it comes off over the head. We were able to observe and document that a significant number of animals remain fully conscious during the skinning process and started to writhe and move around. Workers used the handle of the knife to beat the animals' head repeatedly until they became motionless once again. Other workers stepped on the animal's head or neck to strangle it or hold it down. Animals that had not been fully stunned or regained consciousness during skinning struggled helplessly, trying to defend themselves to the very end. Even after their skin has been stripped off, breathing, heartbeat, directional body and eyelid movements were evident for up to 5 to 10 minutes.

9. Fur Processing

China is the world's leading producer of fur garments. Added to its domestic production of fur, China imports five million mink pelts and 1.5 million fox pelts each year.[22] This amounts to 40% of the world's fur auction house transactions. Many of these pelts are dyed in China before being re-exported as fashionably coloured fur trimmings.

In 2002/03, 40% of fox pelts produced in Finland (845,325) were exported to China and Hong Kong. Thirty-eight percent of Finland's mink production too was exported to China – the equivalent of 1,633,682 pelts.[26] The sheer scale in numbers of animals killed in and around the major fur processing centres poses a considerable environmental burden. Enormous amounts of blood and offal accumulate in these open-air slaughter facilities. The same applies to tanneries, where dangerous chemicals, including chromium, represent an additional health and environmental hazard. According to Professor Cheng Fengxia of Shaanxi University of Science and Technology, "*Pollution caused by inappropriate processing, especially colouring the fur, has become a headache.*"[22] At markets in Haining in Zhejiang Province for example, nearly 100,000 pelts are traded each and every day. They are then treated, processed, coloured, trimmed or woven to match the fashion tastes of the day.

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10. Welfare

The past two and a half decades have seen the emergence of a robust new scientific discipline: Animal Welfare Science. Multidisciplinary by nature, it incorporates veterinary and behavioural science, physiology, wildlife biology, immunology, neurobiology and endocrinology. These developments have not only sparked the advent of scientific journals such as *Animal Welfare* and the *Journal of Applied Animal Welfare Science*, but the creation of a growing number of university departments and degree courses dedicated to this topic. The following section provides a brief introduction to the rationale of this discipline and is intended to serve as a context for subsequent discussions.

What is Animal Welfare?

Every living organism is affected by its environment. Individuals must constantly adjust to favourable or unfavourable physical or psychological conditions. Depending on the intensity and/or nature of a stimulus, animals (and humans) will either adapt easily, with difficulty, or not at all. In order to understand and assess environmental effects on animals, we must examine "*the state of an individual as regards its attempts to cope with its environment, the extent to which coping attempts are successful, and the effort invested in coping*" – together they describe an animal's welfare.[27] It is important to understand that animal welfare, like health, is an innate quality of the individual, not an externally attributed characteristic.[28] Like health, which forms part of welfare, welfare can be affected by genetic make-up, prior experience, gender, age and environmental circumstances.[27] In each individual and at any given time, welfare, like health, ranges from good to poor along a continuous scale. This scale includes an optimal and a tolerable range, beyond which lies pathology.

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"It is a fact that fur farming and good welfare go hand in hand."

British Fur Trade Association[11]

Some environmental stimuli are so intense, prolonged or frequent that it is impossible for animals to adapt.[29-33] Such conditions harm biological function and lead to physiological and/or behavioural pathology.[34-36] Individuals experiencing such conditions are suffering from biological stress and poor welfare.[28, 31] In this state, a variety of interrelated physiological, metabolic, endocrinological, neurological and behavioural processes, are affected, which in turn can impair immune function, reproduction, growth and longevity.[36-38] Qualitative and quantitative changes in these parameters are used in the scientific assessment of animal welfare. Therefore, welfare is likely to be poor if animals die prematurely, fail to reproduce, show increased disease susceptibility, exhibit certain hormonal or metabolic changes, or display particular pathological behaviour patterns.

Health and Welfare in Chinese Fur Farms

The evidence presented in this report shows that China's colossal fur industry routinely subjects animals to housing, husbandry, transport and slaughter practices that are unacceptable from a veterinary, animal welfare and moral perspective.

Animals were universally handled roughly and confined to rows of inappropriate, small wire cages, in all farms, Markets and slaughter facilities visited. Signs of extreme anxiety and pathological behaviours were prominent throughout. Other obvious indicators of poor welfare include high cub mortality, self-mutilation and infanticide. Slaughter procedures too were grossly inhumane, forcing millions of animals to endure a drawn out, violent, inconceivably painful and distressing death.

China is the biggest fur trade production and processing base in the world.[15] Each year unimaginable numbers of animals are forced through Chinese fur farms and slaughter houses for the sake of their skins. Yet, China is still without any legal provisions for animal welfare. The most recent initiatives to address this legislative vacuum were shelved last year.

Behavioural Problems and Captivity

When individuals are placed into artificial environments, both the complexity and amount of their physical surroundings are dramatically reduced. In addition, captive animals are forced to tolerate and closely interact with humans, who control every aspect of their daily lives.[39] In the wild, animals can control stimulus loads by making behavioural adjustments, such as approach, attack, chase, explore, avoid or hide. In a dramatic 'reality shift', these coping strategies are no longer available in most captive situations.[39, 40] Lack of control and exposure to inescapable adversity is recognised as profoundly damaging, and it has therefore been argued that many chronic stressors are unique to captive environments.

Professor Donald Broom, of the Veterinary Department of the University of Cambridge, argues that behavioural abnormalities are best suited for the detection of chronic welfare problems.[31] Where they occur they are usually associated with the absence of 'resources' the animal requires and the acccompanying frustration. This can mean anything from access to more space, a more stimulating or quiet or environment, the ability to perform certain behaviours and access to social or sexual partners.[32]

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"I don't think that China needs any legislation concerning fur animals… in China we trust the Finnish ability and know-how of how to farm foxes because Finns have bred fur animals over 1,000 years."

A Chinese fur farmer[16]

In Chinese fur farms, foxes, raccoon dogs, mink and rabbits are confined to cramped wire mesh cages. European guidelines stated in the Council of Europe's 'Standing Committee of the European Convention for the Protection of Animals Kept for Farming Purposes: Recommendation Concerning Fur Animals' [41] stipulate a minimum cage area for foxes on fur farms of 0.8m² or 8000cm². Some of the larger cages holding foxes and raccoon dogs in China measured around 90 x 70cm, the equivalent of 0.63m² or 6300cm². Thus, even in the larger cages, foxes and raccoon dogs have a third less floor space and 14% (10cm) less cage height than *minimum* EC recommendations.

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"Fur farmers have a vested interest in keeping their animals healthy and content."

International Fur Trade Federation[8]

Farmed foxes are known to suffer from extreme fear,[42-44] which is exacerbated by close proximity of humans, frequent and rough handling, inability to withdraw and crowded housing near other foxes. According to Council of Europe recommendations, foxes should therefore be supplied with year-round nest boxes.[41] However, in addition to being confined in unsuitably small cages, foxes on Chinese fur farms have been denied this. Fear has been linked to physiological stress, the development of abnormal behaviours (see below), infanticide in nursing mothers and - not surprisingly - poor welfare. All are widespread on Chinese fur farms, as are signs of self-mutilation. In addition to excessive fear, research has identified the barrenness of cages and impaired reproduction as major problems associated with fox farming. Their presence too, has therefore been linked with poor welfare in this species. In recognition of these factors, several European countries have banned or severely restricted fox farming. EU recommendations also stipulate that "*until there is sufficient information on the welfare of raccoon dogs, keeping of this species on fur farms should be discouraged*." [44]

Caged animals often perform repetitive, invariant behaviour patterns that serve no apparent function. They are collectively known as *stereotypies*.[46] These behaviours are frequently seen in captive animals, and in carnivores typically take the form of pacing back and forth. In some cases, pacing may be accompanied by, or consist solely of other repetitive movements, such as a nodding or circling of the head – a common sight in farmed mink.

Stereotypies have been associated with poor welfare in captive animals for more than five decades, since they tend to develop in conditions that have been identified as stressful and aversive.[31, 47, 48] Based on scientific evidence, such situations include restrictive environments, lack of stimulation and unavoidable fear or frustration.[46] They are particularly common in inappropriate sterile and restrictive housing conditions[49, 50] and often occur where animals have been unable to extract themselves from stressful situations.[46-48] Scientific research on this topic has led to stereotypic behaviour being used as an indicator of poor welfare and coping difficulties in both human and nonhuman animals.[31, 46] Therefore, "*any individual showing them has a problem*." [31]

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"Only good animal welfare is acceptable for fur farmed animals and this should be the basis of all animal husbandry legislation."

British Fur Trade Association[14]

During her research at Oxford University, Dr Ros Clubb, who recently joined Care for the Wild International's Project Team, found that the greater the constraint on natural behaviour in captivity, the more stereotypies and other signs of poor welfare are shown by captive carnivores. Species that usually travel great distances in the wild show the highest levels of stereotypy and infant mortality compared to species that hold smaller natural territories in the wild. Part of Dr Clubb's work involved investigating the stereotypies of animals farmed for their fur, including mink and foxes. The few studies that exist on the stereotypies of farmed foxes show the behaviour to be infrequent, occupying on average less than 1% of the animals' time.[44, 53] Observations and video footage of foxes confined in Chinese fur farms show extreme levels of stereotypic behaviour, indicating that the animals' housing conditions are grossly inadequate and result in serious welfare problems.

Foxes on Chinese fur farms were often inactive and apathetic, often huddling in the back of their cages. Ongoing uncontrollable aversive stimulation can lead to a behavioural response termed '*learned helplessness*'[54], which at first glance can appear similar to habituation.[55] However, the behavioural sign of 'giving up' in the face of uncontrollable aversive conditions is linked to profound physiological effects[56] associated with poor welfare.

Fur Quality

In one of its perennial arguments in defence of fur farming, the industry claims that fur quality is a sure fire indicator that animals are well cared for. Statements like, "*It is a fact that fur farming and good welfare go hand in hand*" [22] may

sound sensible, but it's not that simple. Foxes and mink are killed after their first winter moult, when their coat is in prime condition. Years of selective breeding for fur quality have produced animals whose fur quality is less sensitive to welfare conditions than, say that of companion animals. In its report on the welfare of animals farmed for fur, the Scientific Committee on Animal Health and Animal Welfare of the European Commission (p73) states: "*fur clarity and density do not correlate with any other welfare measure. Thus, except in extreme cases indicative of pre-clinical or clinical conditions, or cases of pelt biting, considered below, mink pelt condition is probably best considered a production measure rather than a sensitive welfare measure*." [44]

Cub Mortality

Infanticide is a familiar problem on fox farms. According to fur farm owners in China, average cub mortality to weaning is 50%. This is exceptionally high even for foxes on farms. In Sweden an estimated 15–30% of fox cubs die before weaning and in Finland, the fur trade magazine 'Turkistalous' mentions an estimated 30% mortality in 1990.[57] A Norwegian study referred to by the European Commission in its report 'The Welfare of Animals kept for Fur Production', describes cub mortality levels of 16.8% for silver foxes and 22% for red foxes.[58]

Artificial Insemination

Artificial insemination is common on fur farms, including those in China. In Finland, the use of artificial insemination has given rise to welfare concerns, which fur farm workers have reportedly conveyed to the Finnish animal protection organisation, Animalia.[16] Artificial insemination is said to be used mostly to crossbreed blue and silver foxes, whose natural mating periods do not overlap. According to this source, "*precise timing is needed if the female is not to be hurt. If heat detectors and insemination devices are used too early, injuries result. Too high a voltage in the heat detection device causes convulsions. Lack of hygiene and ripping of membranes are reported to have resulted in thousands of deaths. Sperm collection is an unpleasant procedure with foxes struggling to get away and damaging their teeth on tongs. The same donor can be used several times a week*." [57]

Transport

Welfare problems associated with transporting domestic or wild animals are numerous.[32] Transport is known to be stressful. This fact is acknowledged even by the international fur industry.[59] Yet, in China, animals are frequently transported to markets, where they are slaughtered, over considerable distances and under appalling conditions.

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Slaughter

The evidence that animals feel pain and seek to avoid it is overwhelming.[60-63] The body's nocicpetive system is responsible for pain perception. It includes anatomical, physiological and biochemical elements, such as receptors, neuronal pathways and uses specific transmitter substances, which are present in most animals, including man.[64-66] All vertebrates have such a system, which varies little from one mammalian species to another, and invertebrates have some components of it. Such evidence *"suggests strongly that pain can be experienced by all animals."* [28] Recent experimental research on several mammalian species (including man) has confirmed that the pain thresholds for thermal stimuli and pressure are approximately the same for all species examined.[67, 68] However, phylogenetic distance from our own species can affect our ability to interpret an animal's response to pain.[28, 69]

Slaughter practices used on animals farmed for fur in China involved extremely rough handling and stunning or attempts to stun the animals with repeated blows to the head or by being flung head first against the ground. Following this treatment animals were often left next to, or piled on top of each other. Some animals may have been dead, others stunned. Clearly injured, many were convulsing, trembling or trying to crawl away. Workers made no attempts to ensure that animals were dead before skinning. In other cases animals regained consciousness as their skin was being removed. Workers then used the handle of their knife to beat the animals' head repeatedly until they became motionless once again. Others simply stepped on the animals' head or neck to strangle it or hold it down. Desperate and writhing in agony, animals conscious during these proceedures hopelessly tried to defend themselves even to the point where all their skin had been forced off. Even so, breathing, heart beat, directional body and eyelid movements were evident for 5 to 10 minutes.

Regulations and scientific discussions of killing methods for animals held in fur farm generally refer to methods such as gassing, lethal injection and electrocution. [e.g. 41, 42, 44] None anticipated having to address recommendations on animals being clubbed, choked or skinned to death.

Because animals can experience pain and fear, inflicting them has moral implications. Regulations and technical discussions of slaughter practices that take at least some account of what science has to say on these matters, emphasise the importance of minimising pain and distress.

Article 22 of the Council of Europe Standing Committee of the European Convention for the Protection of Animals Kept for Farming Purposes (T-AP)'s 1999 recommendation concerning fur animals states that:

1. Killing shall be done by a competent person without causing undue agitation, pain or other forms of distress. The method chosen shall either:

a. cause immediate loss of consciousness and death, or
b. rapidly induce deep general anaesthesia culminating in death, or
c. cause the death of an animal which is anaesthetised or effectively stunned without any aversive influence on the animal.

Appendix F lists the principal methods which can, when used correctly, meet these requirements and which should be applied when permitted under domestic law and in accordance with domestic law.

2. The person responsible for the killing shall ensure that for each animal the requirements under paragraph 1 above are fulfilled, and that the animal is dead before further procedures are carried out.

3. Killing shall be done so as to cause the least possible disturbance to the other animals.

The slaughter methods furbearing animals are subjected to in China fail to meet, or come close to meeting, any of these provisions. Instead, the lives of millions of animals held captive in Chinese fur farms are characterised by extraordinary and chronic suffering, before being terminated in the most violent and agonising deaths.

11. Conclusions

Conditions on Chinese fur farms make a mockery of the most elementary animal welfare standards. In their lives and their unspeakable deaths, these animals have been denied even the most simple acts of kindness. Instead, millions of individuals are forced to endure the most profound indifference to their suffering, dignity and most basic needs – in the name of fashion. This report shows that China's colossal fur industry routinely subjects animals to housing, husbandry, transport and slaughter practices that are unacceptable from a veterinary, animal welfare and moral point of view.

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Animals are killed "very quickly (counted in seconds) and without pain."

International Fur Trade Federation [8]

According to industry sources, fur has re-established its position in the fashion world. Reportedly, more than 350 leading international fashion designers now include fur in their collections. With ever growing product ranges, manufacturing methods and colour selections, the International Fur Trade Federation (IFTF) and its national member organisations have done a good job peddling fur to the mass market as fashion 'must-haves'. Many shoppers, who might flinch at buying a full length fur coat, might still be seduced by a coat with a fur collar, a parka with fur trim around the hood, a scarf, or wrap, or a handbag with fur detail. Alternatively, the animal connection may be less apparent with fur that has been shaved, knitted or dyed, or combined with other materials. No longer regarded purely as a luxury product, fur today is mass produced and 'affordable'. But at what cost? Fur trim may not seem so bad, but fur is fur, and in order to put it on a garment an animal has to die – and as we have seen, that death isn't always easy. Neither was it's life. The international fur industry, of which China is an integral part, is working to a fallacy. To borrow the words of Catherine Aga Khan, "*As consumers, let us not be deceived by propaganda which suggests there can be such a thing as "humanely" produced fur*".[16] Let us be clear: the euphemisms espoused by the IFTF are designed to hide the hideous truth about the horror that is the life and death of the millions of animals caught up in this nightmare behind a sanitised and glossy world of high fashion and wholesomeness - backed by million dollar PR campaigns.

With fur production, processing and retailing of fur available on international markets increasingly shifting to China, which is part of the IFTF, the issues raised by this report have become something that should concern us all. China is the world's biggest exporter of fur garments; the European Union the world's biggest consumer of fur. It therefore comes as no surprise that a random market survey of boutiques and department stores in Switzerland and London uncovered fur garments labelled "Made in China" among top fashion brands. In the Treaty of Amsterdam, EU member states endorse "*improved protection and respect for the welfare of animals as sentient beings*". Yet, housing conditions, husbandry, transport and slaughter practices fall radically short of EU, UK and Swiss animal welfare regulations.

In 1989, the UK government's welfare advisory body, the Farm Animal Welfare Council, announced its disapproval of mink and fox farming, noting that "*the systems employed ... do not satisfy some of the most basic criteria ... identified for protecting the welfare of farm animals*." [70] Ten years later, fur farming was banned in the UK on humanitarian grounds. However British businesses continue to profit from fur on a grand scale. It seems schizophrenic that members of the British Fur Trade Association turn over £500 million a year as the world's largest buyers of pelts, in a country where fur farming has been made illegal to protect fur bearing animals.

Between 10 and 24 foxes and 36 to 65 mink are killed to make a single fur coat, but the vast majority of fox pelts are used for trim. Professor Rev. Andrew Lindzey once said, "*All the ways we exploit animals are terrible, but none of them is more terrible than the living hell we create for animals on fur farms*." [71] Their beautiful coats, designed to protect them, have become their one-way ticket to this hell. On one of its web pages, the British Fur Trade Association boasts, "*We know that consumers are voting with their feet and wallets as they flock to the shops to buy fur*." [72] What we buy changes the world. The fur industry is right. Buying fur is about choice. It is our sincere hope that this report will serve to inform the choices of many potential fur enthusiasts. In defence of fur farming, the international fur industry has appealed to "*Britain's inherent sense of fairness*". In defence of the animals, we would like to do the same.

In view of the findings presented in this report we appeal to:

- Fashion designers to shun the use of fur in their collections and use non-violent materials instead
- Shoppers not to buy fur garments or accessories or clothes with fur trimmings
- Shoppers to check whether designers incorporate fur in their collections
- Fashion retailers not to stock garments or accessories or clothes with fur trimmings
- EU member states and the European Parliament to ban the import of fur from China and of garments that contain such fur
- Chinese government to urgently introduce and enforce legislation prohibiting the skinning of live animals
- Chinese government to urgently introduce and enforce legislation prohibiting inhumane treatment and slaughter methods
- Chinese government to introduce and enforce legislation prohibiting the inhumane confinement of animals

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DEPARTMENT of the INTERIOR
news release

U. S. FISH AND WILDLIFE SERVICE

Megan Durham 202/343-5634
Alaska Public Affairs 907/276-3800

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THE UNITED STATES PROHIBITS IMPORTATION OF "RACCOON DOG"

The U.S. Fish and Wildlife Service has listed the raccoon dog as an injurious animal under the Lacey Act in order to limit its importation into the United States. The injurious animal list includes species such as the mongoose, the fruit bat, Indian wild dog and others which the Secretary of the Interior has determined are harmful to the environment.

Raccoon dogs, though actually Asiatic canids, resemble the American raccoon and have many raccoon-like habits including a wide selection of foods ranging from bird eggs and small mammals to carrion and garbage. Their scientific name is Nyctereutes procyonoides.

Between 1929 and 1955, Russian wildlife agents captured nearly 9,000 raccoon dogs from their natural Eastern Siberian range and released them as furbearers in central and western parts of the Soviet Union. From these stocks, the animals have become widely established in Europe from Scandinavia to Greece.

Their dense, yellowish, black-tipped pelage is used by furriers for coat trim and parka linings. Two American fur farms already raise raccoon dogs, selling their pelts to the fur trade for an average of about $80 each. Although none of the captive animals is known to have escaped at this time, it is feared that if more fur farms were allowed to raise the animals, accidental releases would eventually occur as has already happened with nutria, gerbils, monk parakeets, walking catfish, and other exotic animals. The danger, according to Robert Jantzen, director of the Interior Department's U.S. Fish and Wildlife Service, is that the diminutive but adaptable dogs would move into ecological niches already occupied by native American furbearers. "Their ability to live in many different climates and forage on a wide variety of foods put them at an advantage over native furbearers. Bobcats, lynxes, foxes, badgers, opossums, skunks, and raccoons might suffer if raccoon dogs take hold." The alien animals could also do serious damage to ground nesters such as ducks, geese, and upland game birds.

Like its namesake, the raccoon dog weighs from 10 to 17 pounds, has dense, grizzled fur, black cheek spots, small feet, and a full tail. It is also nocturnal. Unlike the raccoon who usually makes its den in a hollow tree, however, the raccoon dog digs its own burrow. And like a bear it fattens up in the fall and sleeps through the coldest months. It is, in fact, the only known winter sleeper of the world's canids.

(more)

The Canadian Wildlife Service placed the raccoon dog on its Import Control List in October 1981.

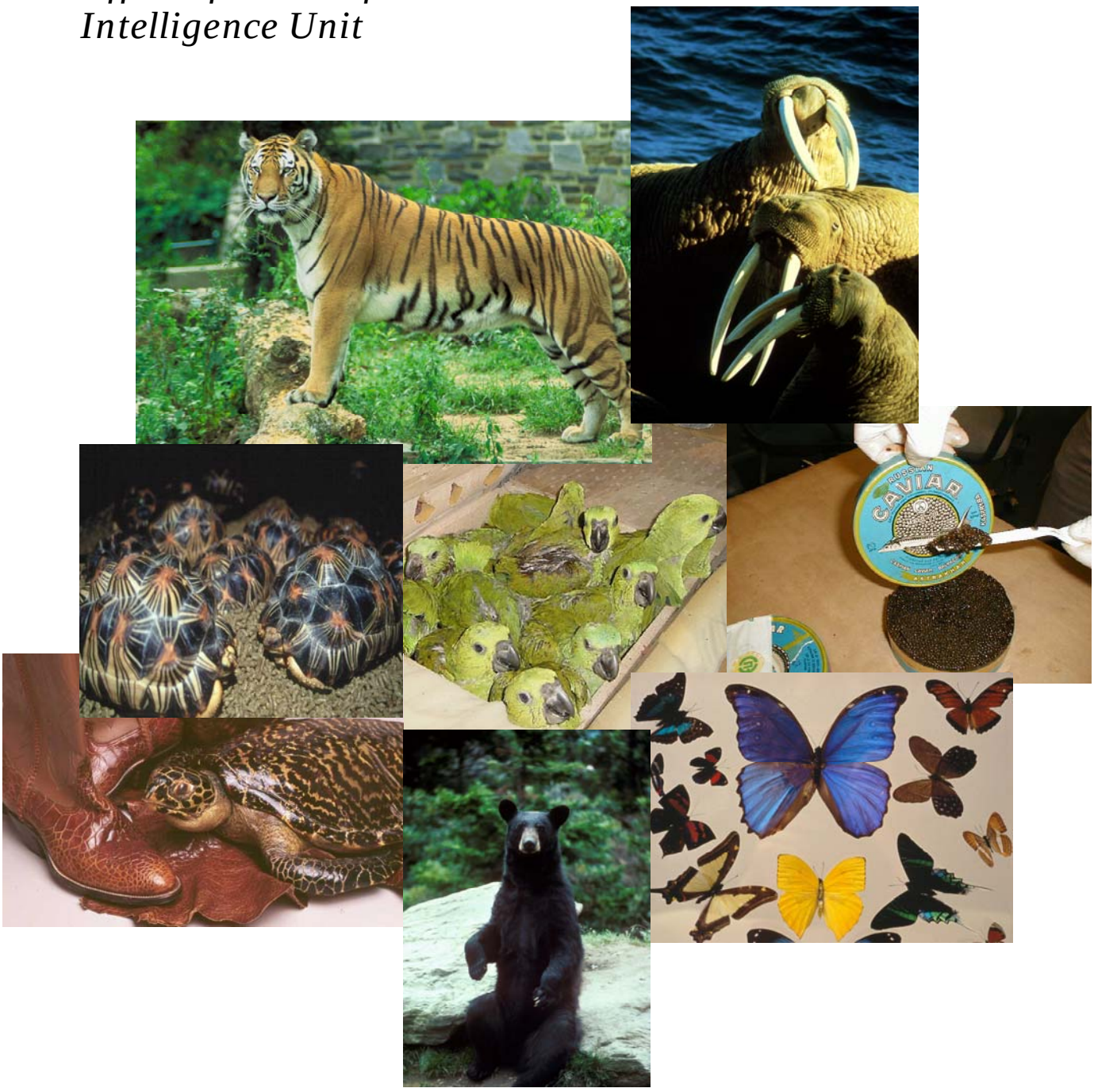
Listing raccoon dogs as injurious animals prohibits both the importation and interstate shipment of live specimens except under permit for scientific, medical, educational, or zoological purposes.

-FWS-

U.S. Fish & Wildlife Service

U.S. Wildlife Trade: An Overview for 1997-2003

Office of Law Enforcement
Intelligence Unit



Appendix B: Common Names, Scientific Names and LEMIS Species Codes

Common Name	Scientific Name	Species Code
Abalone	*Haliotis spp.*	HAT?
Alligator, American	*Alligator mississippiensis*	ALLM
Amazon, Hispaniola	*Amazona ventralis*	AVEN
Axolotl	*Ambystoma mexicanum*	AMBM
Bear, American black	*Ursus americanus*	BLBE
Bear, Kodiak	*Ursus arctos middendorffi*	URAM
Beaver	*Castor canadensis*	BEAV
Bison	*Bison bison*	BIBI
Bobcat	*Lynx rufus*	LUNR
Bobwhite	*Colinus spp.*	CLN?
Bullfrog	*Rana catesbeiana*	RACA
Bullfrog	*Rana macrodon*	RAMA
Bullfrog, Indian	*Hoplobatrachus tigerinus*	RATI
Butterflies, non-CITES	Lepidoptera	BUTT
Caiman, common	*Caiman crocodylus*	CAC?
Caribou	*Rangifer tarandus*	CARI
Carp	*Cyprinus carpio*	CCRP
Catfish	Siluriformes	CFSH
Chinchilla	*Chinchilla lanigera*	CHIN
Cod, Atlantic	*Gadus morhua*	GMOR
Conch, queen	*Strombus gigas*	STGI
Coral, black	*Cirrhipathes anguinas*	CIRA
Coral, black	*Antipathes densa*	ADEN
Coral, red	*Corallium spp.*	CRL?
Coral, red	*Corallium rubrum*	CORU
Coral, red	*Corallium nobile*	CNOB
Coral, stony	Scleractinia	SC00
Coyote	*Canis latrans*	COYO
Crane, sandhill	*Grus canadensis*	SACR
Crocodile	*Crocodylus spp.*	CYO#, CRO#
Crocodile, Morelet's	*Crocodylus moreletti*	CRMO
Crustaceans	Crustacea	CRUS
Cuttlefish	*Sepia spp.*	SEA?
Deer, fallow	*Dama dama*	CEDA
Deer, mule	*Odocoileus hemionus*	MDER
Deer, musk	*Moschus spp.*	MOSM, MOS?
Deer, red	*Cervus elaphus*	ELKK
Deer, white-tailed	*Odocoileus virginianus*	WDER
Dog, raccoon	*Nyctereutes procyonoides*	NYPR
Dove, mourning	*Zenaida macroura*	MODO
Duck/goose	Anatidae	AN00, AT00, AN$$

Fur Products Name Guide

Name	Order	Family	Genus-species
Alpaca	~~Ungulata~~ Artiodactyla	Camelidae	Lama pacos
~~Antelope~~ Sable antelope [Hippotragus niger] Blackbuck [Antilope cervicapra]	~~do~~ Artiodactyla	Bovidae	Hippotragus niger [Sable antelope] ~~and~~ Antilope cervicapra [Blackbuck]
~~Badger~~ American Badger [Taxidea taxus] Asian Badger [Meles leucurus] Japanese Badger [Meles anakuma] European Badger [Meles meles]	Carnivora	Mustelidae	~~Taxida sp. and~~ Taxidea taxus [American Badger] ~~Meles sp.~~ Meles anakuma [Japanese Badger] Meles leucurus [Asian Badger] Meles meles [European Badger]
~~Bassarisk~~ Ringtail	~~do~~ Carnivora	Procyonidae	Bassariscus astutus
~~Bear~~ Bear, Black [Ursus americanus] Bear, Brown [Ursus arctos] Bear, Polar [Ursus maritimus] Bear, Asian Black [Ursus thibetanus]	~~do~~ Carnivora	Ursidae	~~Ursus sp.~~ Ursus americanus Ursus arctos Ursus maritimus Ursus thibetanus
Bear, Polar **[note: Dual entry (see "Bear" in original) – eliminate one]**	~~do~~ Carnivora	~~do~~ Ursidae	~~Thalarctos sp.~~ [Ursus maritimus]
Beaver	Rodentia	Castoridae	Castor canadensis
~~Burunduk~~ Siberian Chipmunk**[Dual entry (see "Chipmunk" in original); eliminate one]**	~~do~~ Rodentia	Sciuridae	~~Eutamias asiaticus~~ Tamias sibiricus
~~Calf~~ Cattle, Domestic	~~Ungulata~~ Artiodactyla	Bovidae	Bos taurus
~~Cat, Caraca~~ Cat, Caracal	Carnivora	Felidae	Caracal caracal
Cat, Domestic	~~do~~ Carnivora	~~do~~ Felidae	Felis catus
~~Cat, Lynx~~ Bobcat	~~do~~ Carnivora	~~do~~ Felidae	Lynx refus
~~Cat, Manul~~ Pallas' Cat	~~do~~ Carnivora	~~do~~ Felidae	Felis manul

Cat, Margay	~~do~~ Carnivora	~~do~~ Felidae	~~Felis wiedii~~ Leopardus wiedii
~~Cat, Spotted~~	~~do~~	~~do~~	~~Felis sp. (South America)~~ [note: further research needed to determine intended species]
Cat, Wild	~~do~~ Carnivora	~~do~~ Felidae	~~Felis catus and Felis lybica~~ Felis silvestris
Cheetah	~~do~~ Carnivora	~~do~~ Felidae	Acinonyx jubatus
~~Chinchilla~~ Short-tailed Chinchilla	Rodentia	Chinchillidae	Chinchilla chinchilla [Note: further research needed on authoritative genus-species for "Short-tailed Chinchilla" (ITIS.gov indicates Chinchilla brevicaudata, IUCNredlist.org indicates Chinchilla chinchilla as 2005 change.]
~~Chipmunk~~ alpine chipmunk [Tamias alpinus] yellow-pine chipmunk [Tamias amoenus] Buller's chipmunk [Tamias bulleri] gray-footed chipmunk [Tamias canipes] gray-collared chipmunk [Tamias cinereicollis] cliff chipmunk [Tamias dorsalis] Durango chipmunk [Tamias durangae] Merriam's chipmunk [Tamias merriami] least chipmunk [Tamias minimus] California chipmunk [Tamias obscurus] yellow-cheeked chipmunk [Tamias ochrogenys] Palmer's chipmunk [Tamias palmeri] panamint chipmunk [Tamias panamintinus] long-eared chipmunk [Tamias quadrimaculatus] Colorado chipmunk [Tamias quadrivittatus] red-tailed chipmunk [Tamias ruficaudus] Hopi chipmunk [Tamias rufus] Allen's chipmunk [Tamias senx] Siberian chipmunk [Tamias sibiricus] **[note: dual entry (see "Burunduk"; eliminate one]** Siskiyou chipmunk [Tamias siskiyou] Sonoma chipmunk [Tamias sonomae] lodgepole chipmunk [Tamias speciosus] eastern chipmunk [Tamias striatus] Townsend's chipmunk [Tamias townsendii] Uinta chipmunk [Tamias umbrinus]	~~do~~ Sciuridae	Sciuridae	~~Eutamias sp.~~ Tamias alpinus [alpine chipmunk] Tamias amoenus [yellow-pine chipmunk] Tamias bulleri [Buller's chipmunk] Tamias canipes [gray-footed chipmunk] Tamias cinereicollis [gray-collared chipmunk] Tamias dorsalis [cliff chipmunk] Tamias durangae [Durango chipmunk] Tamias merriami [Merriam's chipmunk] Tamias minimus [least chipmunk] Tamias obscurus [California chipmunk] Tamias ochrogenys [yellow-cheeked chipmunk] Tamias palmeri [Palmer's chipmunk] Tamias panamintinus [panamint chipmunk] Tamias quadrimaculatus [long-eared chipmunk] Tamias quadrivittatus [Colorado chipmunk] Tamias ruficaudus [red-tailed chipmunk] Tamias rufus [Hopi chipmunk] Tamias senex [Allen's chipmunk] Tamias sibiricus [Siberian chipmunk] Tamias Siskiyou [Siskiyou chipmunk] Tamias sonomae [Sonoma chipmunk] Tamias speciosus [lodgepole chipmunk] Tamias striatus [eastern chipmunk] Tamias townsendii [Townsend's chipmunk] Tamias umbrinus [Uinta chipmunk]

~~Civet~~ Malabar Large-spotted Civet [Viverra civettina] Large-spotted Civet [Viverra megaspila] Malayan Civet [Viverra tangalunga] Large Indian Civet [Viverra zibetha] Asian Palm Civet [Paradoxurus hermaphroditus] Jerdon's Palm Civet [Paradoxurus jerdoni] Golden Palm Civet [Paradoxurus zeylonensis] Masked Palm Civet [Paguma larvata]	Carnivora	Viverridae	~~Viverra sp.,~~ Viverra civettina [Malabar Large-spotted Civet] Viverra megaspila [Large-spotted Civet] Viverra tangalunga [Malayan Civet] Viverra zibetha [Large Indian Civet] ~~Viverricula sp.,~~ Viverricula indica [Small Indian Civet] ~~Paradoxurus sp.,~~ Paradoxurus hermaphroditus [Asian Palm Civet] Paradoxurus jerdoni [Jerdon's Palm Civet] Paradoxurus zeylonensis [Golden Palm Civet] ~~Paguma sp., and~~ Paguma larvata [Masked Palm Civet] ~~Herpestes sp.~~ [note: Herpestes genus is the mongooses]
~~Desman~~ Russian Desman [Desmana moschata] Pyrenean Desman [Galemys pyrenaicus]	~~Insectivora~~ Soricomorpha	Talpidae	Desmana moschata [Russian Desman] ~~and~~ Galemys pyrenaicus [Pyrenean Desman]
~~Dog~~ Domestic Dog	Carnivora	Canidae	~~Canis familiaris~~ Canis lupus familiaris
Ermine	~~do~~ Carnivora	Mustelidae	Mustela ermine
Fisher	~~do~~ Carnivora	~~do~~ Mustelidae	Martes pennanti
~~Fitch~~ European polecat	~~do~~ Carnivora	~~do~~ Mustelidae	Mustela putorius
~~Fox~~ Red Fox [Vulpes vulpes] Kit Fox [Vulpes macrotis] **[note: dual entry (see "Kit Fox" in original); eliminate one]**	~~do~~ Carnivora	Canidae	~~Vulpes fulva,~~ [note: subspecies vulpes vulpes fulvus] Vulpes, vulpes [Red fox] ~~and~~ Vulpes macrotis [kit fox]
~~Fox, Blue~~ Arctic Fox **[note: dual entry (see "White Fox" in original); eliminate one]**	~~do~~ Carnivora	~~do~~ Canidae	~~Alopex sp.~~ Vulpes lagopus
~~Fox, Grey~~	~~do~~	~~do~~	Urocyon cinereoargenteus [common gray fox]

common gray fox [Urocyon cinereoargenteus] Channel Islands gray fox [Urocyon littoralis]	Carnivora	Canidae	and Urocyon littoralis [Channel Islands gray fox]
Fox, Kit **[note: dual entry (see "Fox" in original); eliminate one]**	~~do~~ Carnivora	~~do~~ Canidae	~~Vulpes velox~~ Vulpes macrotis
~~Fox, White~~ Arctic Fox **[note: Dual entry (see "Blue Fox" in original); eliminate one]**	Carnivora	Canidae	~~Alpoex sp~~ [Note: apparent misspelling of "Alopex"] Vulpes lagopus
Genet	do	Viverridae	Genetta genetta
~~Goat~~ Domestic Goat **[note: dual entry (see "Kid" in original); eliminate one]**	~~Ungulata~~ Artiodactyla	Bovidae	~~Cpara prisca~~ [Note: apparent misspelling of "Capra"] Capra hircus
Guanaco~~, or its young, the Guanaquito~~	~~do~~ Artiodactyla	Camelidae	Lama guanicoe
~~Hamster~~ black-bellied hamster	Rodentia	~~Cricetidae~~ Muridae	Cricetus cricetus
~~Hare~~ Japanese Hare [Lepus brachyurus] black-tailed jack rabbit [Lepus californicus] White-sided jack rabbit [Lepus callotis] Cape Hare [Lepus capensis] Corsican Hare [Lepus corsicanus] Tehuantepec hare [Lepus flavigularis] Granada Hare [Lepus granatensis] Abyssinian Hare [Lepus habessinicus] Woolly Hare [Lepus oiostolus] Scrub Hare[Lepus saxatilis] white-tailed jack rabbit [Lepus townsendii] Broom Hare [Lepus castroviejoi] Yunnan Hare [Lepus comus] Korean Hare [Lepus coreanus] European Hare [Lepus europaeus] Manchurian Hare [Lepus mandshuricus] Ethiopian Highland Hare [Lepus starcki] Hainan Hare [Lepus hainanus] Indian Hare [Lepus nigricollis] Burmese Hare [Lepus peguensis] Arctic Hare [Lepus arcticus] Alaskan Hare [Lepus othus] Mountain Hare [Lepus timidus]	~~do~~ Lagomorpha	Leporidae	~~Lepus sp.and~~ ~~Lepus europaeus occidentalis~~ Lepus brachyurus [Japanese Hare] Lepus californicus [black-tailed jack rabbit] Lepus callotis [White-sided jack rabbit] Lepus capensis [Cape Hare] Lepus corsicanus [Corsican Hare Lepus flavigularis [Tehuantepec hare] Lepus granatensis [Granada Hare] Lepus habessinicus [Abyssinian Hare] Lepus oiostolus [Woolly Hare] Lepus saxatilis [Scrub Hare] Lepus townsendii [white-tailed jack rabbit] Lepus castroviejoi [Broom Hare] Lepus comus [Yunnan Hare] Lepus coreanus [Korean Hare] Lepus europaeus [European Hare] Lepus mandshuricus [Manchurian Hare] Lepus starcki [Ethiopian Highland Hare] Lepus hainanus [Hainan Hare] Lepus nigricollis [Indian Hare] Lepus peguensis [Burmese Hare] Lepus arcticus [Arctic Hare]

antelope jack rabbit [Lepus alleni] Snowshoe Hare [Lepus americanus] Black Jackrabbit [Lepus insularis] Desert Hare [Lepus tibetanus] Tolai Hare [Lepus tolai] Ethiopian Hare [Lepus fagani] African Savanna Hare [Lepus microtis] Chinese Hare [Lepus sinensis] Yarkand Hare [Lepus yarkandensis]			Lepus othus [Alaskan Hare] Lepus timidus [Mountain Hare] Lepus alleni [antelope jack rabbit] Lepus americanus [Snowshoe Hare] Lepus insularis [Black Jackrabbit] Lepus tibetanus [Desert Hare] Lepus tolai [Tolai Hare] Lepus fagani [Ethiopian Hare] Lepus microtis [African Savanna Hare] Lepus sinensis [Chinese Hare] Lepus yarkandensis [Yarkand Hare]
~~Jackal~~ Golden Jackal [Canis aureus] Side-striped Jackal [Canis adustus]	Carnivora	Canidae	Canis aureus [Golden Jackal] ~~and~~ Canis adustus [Side-striped Jackal]
~~Jackal, Cape~~ [Black-backed Jackal]	~~do~~ Carnivora	~~do~~ Canidae	Canis mesomelas
Jaguar	~~do~~ Carnivora	Felidae	~~Felis onca~~ Panthera onca
~~Jaguarondi~~ [Note: possible misspelling of “Jaguarundi”] Jaguarundi	~~do~~ Carnivora	~~do~~ Felidae	~~Felis yagouaroundi~~ Puma yagouaroundi
~~Kangaroo~~ Western Grey Kangaroo [Macropus fuliginosus] Eastern Grey Kangaroo [Macropus giganteus]	~~Marsupialia~~ Diprotodontia	Macropodidae	~~Macropus sp.~~ Macropus fuliginosus [Western Grey Kangaroo] Macropus giganteus [Eastern Grey Kangaroo]
~~Kangaroo rat~~ agile kangaroo rat [Dipodomys agilis] California kangaroo rat [Dipodomys californicus] Gulf Coast kangaroo rat [Dipodomys compactus] desert kangaroo rat [Dipodomys deserti] Texas kangaroo rat [Dipodomys elator] San Quintin kangaroo rat [Dipodomys gravipes] Heermann's kangaroo rat [Dipodomys heermanni] giant kangaroo rat [Dipodomys ingens] San Jose Island kangaroo rat [Dipodomys insularis] Margarita Island kangaroo rat [Dipodomys margaritae] Merriam's kangaroo rat [Dipodomys merriami] chisel-toothed kangaroo rat [Dipodomys microps]	~~do~~ Rodentia	~~do~~ Heteromyidae	~~Bettongia sp.~~ Dipodomys agilis [agile kangaroo rat] Dipodomys californicus [California kangaroo rat] Dipodomys compactus [Gulf Coast kangaroo rat] Dipodomys deserti [desert kangaroo rat] Dipodomys elator [Texas kangaroo rat] Dipodomys gravipes [San Quintin kangaroo rat] Dipodomys heermanni [Heermann's kangaroo rat] Dipodomys ingens [giant kangaroo rat] Dipodomys insularis [San Jose Island kangaroo

Nelson's kangaroo rat [Dipodomys nelson] Fresno kangaroo rat [Dipodomys nitratoides] Ord's kangaroo rat [Dipodomys ordii] Panamint kangaroo rat [Dipodomys panamintinus] Phillips's kangaroo rat [Dipodomys phillipsii] Dulzura kangaroo [Dipodomys simulans] banner-tailed kangaroo rat [Dipodomys spectabilis] Stephens' kangaroo rat [Dipodomys stephensi] narrow-faced kangaroo rat [Dipodomys venustus]			rat] Dipodomys margaritae [Margarita Island kangaroo rat] Dipodomys merriami [Merriam's kangaroo rat] Dipodomys microps [chisel-toothed kangaroo rat] Dipodomys nelsoni [Nelson's kangaroo rat] Dipodomys nitratoides [Fresno kangaroo rat] Dipodomys ordii [Ord's kangaroo rat] Dipodomys panamintinus [Panamint kangaroo rat] Dipodomys phillipsii [Phillips's kangaroo rat] Dipodomys simulans [Dulzura kangaroo] Dipodomys spectabilis [banner-tailed kangaroo rat] Dipodomys stephensi [Stephens' kangaroo rat] Dipodomys venustus [narrow-faced kangaroo rat]
~~Kid~~ Domestic Goat [**Duel entry (see "Goat" in original); eliminate one]**	~~Ungulata~~ Artiodactyla	Bovidae	~~Capra prisca~~ Capra hircus
Kinkajou	Carnivora	Procyonidae	Potos flavus
Koala	~~Marsupialia~~ Diprotodontia	Phasocolarctidae	Phascolarctos cinereus
~~Kolinsky~~ Siberian Weasel [**note: dual entry (see "Chinese Weasel" in orginal; eliminate one]**	Carnivora	Mustelidae	Mustela sibirica
~~Lamb~~ Sheep **[note: dual entry (see "Sheep" in original; eliminate one]**	~~Ungulata~~ Artiodactyla	Bovidae	Ovis aries
Leopard	Carnivora	Felidae	~~Felis pardus~~ Panthera pardus
Leopard Cat [note: new entry]	Carnivora	Felidae	Prionailurus bengalensis
Llama	~~Ungulata~~ Artiodactyla	~~Cemelidae~~ [note: misspelling of "Camelidae"] Camelidae	Lama glama
~~Lynx~~ Canada Lynx [Lynx canadensis] Eurasian Lynx [Lynx lynx]	Carnivora	Felidae	Lynx canadensis [Canada lynx] ~~and~~ Lynx lynx [Eurasian lynx]

~~Marmot~~ Bobak Marmot	Rodentia	~~Scinridae~~ [note: apparent misspelling of "Sciuridae"] Sciuridae	Marmota bobak
Marten, American **[note: dual entry (see "American Sable" in orginal); eliminate one]**	Carnivora	Mustelidae	Martes americana ~~and Martes caurina~~ [note: subspecies Martes americana caurina]
~~Marten, Baum~~ European Pine Marten	~~do~~ Carnivora	~~do~~ Mustelidae	Martes martes
Marten, Japanese	~~do~~ Carnivora	~~do~~ Mustelidae	Martes melampus
~~Marten, Stone~~ Beech Marten	~~do~~ Carnivora	~~do~~ Mustelidae	Martes foina
~~Mink~~ European Mink [Mustela lutreola] American Mink [Neovison vison]	~~do~~ Carnivora	~~do~~ Mustelidae	~~Mustela vison and~~ Neovison vison [American Mink] Mustela lutreola [European Mink]
~~Mole~~ Siberian mole [Talpa altaica] Blind Mole [Talpa caeca] Caucasian Mole [Talpa caucasica] Père David's Mole [Talpa davidiana] European Mole [Talpa europaea] Levant Mole [Talpa levantis] Iberian mole [Talpa occidentalis] Roman Mole [Talpa romana] Balkan Mole [Talpa stankovici]	~~Insectivora~~ Soricomorpha	Talpidae	~~Talpa sp.~~ Talpa altaica [Siberian mole] Talpa caeca [Blind Mole] Talpa caucasica [Caucasian Mole] Talpa davidiana [Père David's Mole] Talpa europaea [European Mole] Talpa levantis [Levant Mole] Talpa occidentalis [Iberian mole] Talpa romana [Roman Mole] Talpa stankovici [Balkan Mole]
~~Monkey~~ King Colobus	Primates	~~Colobidae~~ Cercopithecidae	Colobus polykomos
Muskrat	Rodentia	Muridae	Ondatra zibethicus
Nutria	~~do~~ Rodentia	~~Capromyidae~~ Echimyidae	Myocastor coypus
Ocelot	Carnivora	Felidae	~~Felis pardalis~~ Leopardus pardalis

~~Opossum~~ White-eared Opossum [Didelphis albiventris] Big-eared Opossum [Didelphis aurita] Guianan White-eared Opossum [Didelphis imperfecta] Common Opossum [Didelphis marsupialis] Andean White-eared Opossum [Didelphis pernigra] Virginia Opossum [Didelphis virginiana]	~~Marsupialia~~ Didelphimorphia	~~Didelphiidae~~ [note: misspelling of "Didelphidae"] Didelphidae	~~Didelphis sp.~~ Didelphis albiventris [White-eared Opossum] Didelphis aurita [Big-eared Opossum] Didelphis imperfecta [Guianan White-eared Opossum] Didelphis marsupialis [Common Opossum] Didelphis pernigra [Andean White-eared Opossum] Didelphis virginiana [Virginia Opossum]
~~Oppossum, Australian~~ Common Brushtail	~~do~~ Diprotodontia	Phalangeridae	Trichosurus vulpecula
~~Opossum, Ring-tail~~ Common Ringtail	~~do~~ Diprotodontia	~~do~~ Pseudocheiridae	~~Pseudocheirus sp.~~ Pseudocheirus peregrinus
~~Oppossum, South American~~ Lutrine Opossum	~~do~~ Didelphimorphia	~~Didelphiidae~~ [note: apparent misspelling of "Didelphidae"] Didelphidae	Lutreolina crassicaudata
Opossum, Water	~~do~~ Didelphimorphia	~~do~~ Didelphidae	Chironectes minimus
~~Otter~~ North American River Otter [Lontra canadensis] neotroprical river otter [Lontra longicaudis] European Otter [Lutra lutra]	Carnivora	Mustelidae	~~Lutra canadensis~~ Lontra canadensis [North American River Otter] ~~Pteronura brasitionsis,~~ [note: species indicated unclear. Possibly misspelling of Pteronura brasiliensis (Giant Otter)] ~~Lutra annectens~~ Lontra longicaudis [neotroprical river otter] [note: subspecies Lontra longicaudis annectens] Lutra lutra [European Otter]
Otter, Sea	~~do~~ Carnivora	~~do~~ Mustelidae	Enhydra lutris
~~Pahmi~~ Chinese Ferret-badger [Melogale moschata] Burmese Ferret-badger [Melogale personata]	~~do~~ Carnivora	~~do~~ Mustelidae	~~Helictis moschata and~~ Melogale moschata [Chinese Ferret-badger] ~~Helictis personata~~

			Melogale personata [Burmese Ferret-badger]
~~Panda~~ Red Panda	~~do~~ Carnivora	~~Procyonidae~~ Ailuridae	Ailurus fulgens
~~Peschanik~~ Yellow ground squirrel	Rodentia	Sciuridae	~~Citellus fulvus~~ Spermophilus fulvus
~~Pony~~ Horse	~~Ungulata~~ Perissodactyla	Equidae	Equus caballus
~~Rabbit~~ European Rabbit	~~Rodentia~~ Lagomorpha	Leporidae	Oryctolagus cuniculus
~~Raccoon~~ common raccoon [Procyon lotor] Crab-eating Raccoon [Procyon cancrivorus]	Carnivora	Procyonidae	Procyon lotor [common raccoon] ~~and~~ Procyon cancrivorus [Crab-eating raccoon]
~~Raccoon, Asiatic~~ Raccoon Dog	~~do~~ Carnivora	Canidae	~~Nyctereutes procyonoidos~~ [note: misspelling of "procyonoides"] Nyctereutes procyonoides
~~Raccoon, Mexican~~ White-Nosed Coati [Nasua narica] South American Coati [Nasua nasua]	~~do~~ Carnivora	~~do~~ Procyonidae [note: insertion of "Raccoon, Asiatic" rendered Family indication incorrect here]	~~Nasua sp.~~ Nasua narica [White-Nosed Coati] Nasua nasua [South American Coati]
Reindeer	~~Ungulata~~ Artiodactyla	Cervidae	Rangifer tarandus
Sable	Carnivora	Mustelidae	Martes zibellina
~~Sable, American~~ American Marten **[note: dual entry (see "American Marten" in orginal); eliminate one]**	~~do~~ Carnivora	~~do~~ Mustelidae	Martes Americana ~~and Martes caurina~~ [note: subspecies Martes americana caurina]
~~Seal, Fur~~ Northern Fur Seal [Callorhinus ursinus] South American Fur Seal [Arctocephalus australis] Antipodean fur seal [Arctocephalus forsteri] Galapagos Fur Seal [Arctocephalus galapagoensis] Antarctic Fur Seal [Arctocephalus gazella] Juan Fernández Fur Seal [Arctocephalus philippii] Brown Fur Seal [Arctocephalus pusillus]	~~Pinnipedia~~ Carnivora	Otariidae	Callorhinus ursinus [Northern Fur Seal]~~and~~ ~~Arctocephalus sp.~~ Arctocephalus australis [South American Fur Seal] Arctocephalus forsteri [Antipodean fur seal] Arctocephalus galapagoensis [Galapagos Fur Seal] Arctocephalus gazella [Antarctic Fur Seal] Arctocephalus philippii [Juan Fernández Fur

Guadalupe Fur Seal [Arctocephalus townsendi] Amsterdam fur seal [Arctocephalus tropicalis]			Seal] Arctocephalus pusillus [Brown Fur Seal] Arctocephalus townsendi [Guadalupe Fur Seal] Arctocephalus tropicalis [Amsterdam fur seal]
~~Seal, Hair~~ Spotted Seal [Phoca largha] Harbor Seal [Phoca vitulina]	~~do~~ Carnivora	Phocidae	~~Phoca sp.~~ Phoca largha [Spotted Seal] Phoca vitulina [Harbor Seal]
~~Seal, Roc~~ South American Sealion	~~do~~ Carnivora	Otariidae	Otaria flavescens
Sheep **[note: dual entry (see "lamb" in original; eliminate one]**	~~Ungulata~~ Artiodactyla	Bovidae	Ovis aries
~~Skunk~~ Striped skunk [Mephitis mephitis] Hooded Skunk [Mephitis macroura] Molina's Hog-nosed Skunk [Conepatus chinga] Humboldt's Hog-nosed Skunk [Conepatus humboldtii] American Hog-nosed Skunk [Conepatus leuconotus] Striped Hog-nosed Skunk [Conepatus semistriatus]	Carnivora	~~Mustelidae~~ Mephitidae	Mephitis mephitis [striped skunk] Mephitis macroura [Hooded skunk] ~~Conepatus semistriatus~~ ~~and Conepatus sp.~~ Conepatus chinga [Molina's Hog-nosed Skunk] Conepatus humboldtii [Humboldt's Hog-nosed Skunk] Conepatus leuconotus [American Hog-nosed Skunk] Conepatus semistriatus [Striped Hog-nosed Skunk]
~~Skunk, Spotted~~ Southern Spotted Skunk [Spilogale angustifrons] Western Spotted Skunk [Spilogale gracilis] Eastern Spotted Skunk [Spilogale putorius] Pygmy Spotted Skunk [Spilogale pygmaea]	~~do~~ Carnivora	~~do~~ Mephitidae	~~Spilogale sp.~~ Spilogale angustifrons [Southern Spotted Skunk] Spilogale gracilis [Western Spotted Skunk] Spilogale putorius [Eastern Spotted Skunk] Spilogale pygmaea [Pygmy Spotted Skunk]
~~Squirrel~~ Eurasian red squirrel	Rodentia	Sciuridae	Sciurus vulgaris
~~Squirrel, Flying~~ Woolly flying squirrel [Eupetaurus cinereus] Siberian flying squirrel [Pteromys volans] Japanese giant flying squirrel [Petaurista leucogenys]	~~do~~ Rodentia	~~do~~ Sciuridae	Eupetaurus cinereus [Wolly flying squirrel] Pteromys volans [Siberian flying squirrel] Petaurista leucogenys [Japanese giant flying squirrel]
~~Susilk~~ [note: apparent misspelling of "Suslik"] European ground squirrel [Spermophilus citellus] speckled ground squirrel [Spermophilus suslicus]	~~do~~ Rodentia	~~do~~ Sciuridae	~~Citellus citellus,~~ Spermophilus citellus [European ground squirrel] ~~Citellus rufescens~~ [note: indicated species here not determined]

			~~Citellus suslica~~ Spermophilus suslicus [speckled ground squirrel]
Vicuna	~~Ungulata~~ Artiodactyla	Camelidae	Vicugna vicugna
Viscacha	Rodentia	Chinchillidae	Ligidium viscacia
~~Wallaby~~ Wallaby, Swamp [Wallabia bicolor] Rock-wallaby, Allied [Petrogale assimilis] Rock-wallaby, Short-eared [Petrogale brachyotis] Monjon [Petrogale burbidgei] Rock-wallaby, Cape York [Petrogale coenensis] Nabarlek [Petrogale concinna] Rock-wallaby, Godman's [Petrogale godmani] Rock-wallaby, Herbert's [Petrogale herberti] Rock-wallaby, Unadorned [Petrogale inornata] Rock-wallaby, Black-flanked [Petrogale lateralis] Rock-wallaby, Mareeba [Petrogale mareeba] rock wallaby, Brush-tailed [Petrogale penicillata] Rock-wallaby, Proserpine [Petrogale Persephone] Rock-wallaby, Purple-necked [Petrogale purpureicollis] Rock-wallaby, Rothschild's [Petrogale rothschildi] Rock-wallaby, Mt. Claro [Petrogale sharmani] Rock-wallaby, Yellow-footed [Petrogale xanthopus] Pademelon, red-bellied [Thylogale billardierii] Pademelon, Brown's [Thylogale browni] Pademelon, Dusky [Thylogale brunii] Pademelon, Calaby's [Thylogale calabyi] Pademelon, Mountain [Thylogale lanatus] Pademelon, Red-legged [Thylogale stigmatica] Pademelon, Red-necked [Thylogale thetis]	~~Marsupialia~~ Diprotodontia	Macropodidae	~~Wallabia sp.,~~ Wallabia bicolor [Swamp Wallaby] ~~Petrogale sp.,~~ Petrogale assimilis [Allied Rock-wallaby] Petrogale brachyotis [Short-eared Rock-wallaby] Petrogale burbidgei [Monjon] Petrogale coenensis [Cape York Rock-wallaby] Petrogale concinna [Nabarlek] Petrogale godmani [Godman's Rock-wallaby] Petrogale herberti [Herbert's Rock-wallaby] Petrogale inornata [Unadorned Rock-wallaby] Petrogale lateralis [Black-flanked Rock-wallaby] Petrogale mareeba [Mareeba Rock-wallaby] Petrogale penicillata [brush-tailed rock wallaby] Petrogale persephone [Proserpine Rock-wallaby] Petrogale purpureicollis [Purple-necked Rock-wallaby] Petrogale rothschildi [Rothschild's Rock-wallaby] Petrogale sharmani [Mt. Claro Rock-wallaby] Petrogale xanthopus [Yellow-footed Rock-wallaby] ~~Thylogale sp.~~ Thylogale billardierii [red-bellied pademelon] Thylogale browni [Brown's Pademelon] Thylogale brunii [Dusky Pademelon] Thylogale calabyi [Calaby's Pademelon Thylogale lanatus [Mountain Pademelon] Thylogale stigmatica [Red-legged Pademelon] Thylogale thetis [Red-necked Pademelon]
~~Weasel~~ Long-tailed Weasel	Carnivora	Mustelidae	Mustela frenata
~~Weasel, Chinese~~ Weasel, Siberian **[note: dual entry (see "Kalinsky" in original); eliminate one]**	~~do~~ Carnivora	~~do~~ Mustelidae	Mustela sibirica

Weasel, Japanese	~~do~~ Carnivora	~~do~~ Mustelidae	Mustela itatsi ~~(also classified as~~ ~~Mustela sibirica itatsi)~~
~~Weasel, Manchurian~~ Mountain Weasel [Musteal altaica] Least Weasel [Musteal nivalis]	~~do~~ Carnivora	~~do~~ Mustelidae	Mustela altaica [Mountain Weasel] ~~and Mustela rixosa~~ Mustela nivalis [Least weasel] [note: Mustela nivalis rixosa is subspecies]
Wolf	~~do~~ Carnivora	Canidae	Canis lupus ~~and Canis niger~~
Wolverine	~~do~~ Carnivora	Mustelidae	~~Gulo luscus and~~ Gulo gulo
~~Wombat~~ Coarse-haired Wombat	~~Marsupialia~~ Diprotodontia	Vombatidae	~~Vombatus sp.~~ Vombatus ursinus
Woodchuck	Rodentia	Sciuridae	Marmota monax