Statement of support for the proposed inclusion on the American mink (*Neovison vison)* on the list of Invasive Alien Species of Union Concern

On behalf of the Fur Free Alliance (FFA), an international coalition of 40 animal protection organisations, I am writing with regard to the proposed inclusion of the American mink on the List of Invasive Alien Species of Union Concern.

The FFA strongly supports the inclusion of the American mink on this list given that it is one of the most invasive alien mammal species present in Europe and decisive action is necessary to prevent the further spread of the species and to protect biodiversity. Below we outline why we believe that American mink should be listed.

Impact of the American mink on biodiversity

The American mink was first introduced to Europe for the purposes of fur production during the 1920s. Feral populations of American mink, which have become established as a result of animals escaping or being deliberately released from fur farms, are widespread and abundant in Europe. The species is now believed to be present in most EU Member States.

American mink is an invasive mammal species, which has a significant impact on native fauna in Europe, affecting at least 47 native species negatively.[1] Through competition for resources, the American mink has been implicated in the displacement of the European mink and European polecat.[2] In the UK, predation by the American mink has been identified as the main cause for the near extinction of the water vole.[3] Local studies across Europe have shown that the American mink can have a significant impact on ground-nesting bird populations, rodents and amphibians.[4]

To prevent further damage to native biodiversity a number of EU Member States have already implemented preventive measures to avoid new introductions and the further expansion of feral American mink. For example, given the significant damage to local fauna, the establishment of new mink farms in Spain has been prohibited since 2007. In England and Wales, the American mink is listed on Schedule 9 of the Wildlife and Countryside Act 1981, which makes it an offence to release into the wild or knowingly allow to escape.

1 Genovesi, P., Carnevali, L., Alonzi, A. and Scalera, R. (2012) Alien mammals in Europe: updated numbers and trends, and assessment of the effects on biodiversity. Integrative Zoology, 7: 247–253.

2 Maran, T., Skumatov, D., Palazón, S., Gomez, A., Põdra, M., Saveljev, A., Kranz, A., Libois, R. & Aulagnier, S. (2011). Mustela lutreola. The IUCN Red List of Threatened Species. Version 2014.3. www.iucnredlist.org

3 Rushton, S. P., Barreto, G. W., Cormack, R. M., Macdonald, D. W. and Fuller, R. 2000. Modelling the effects of mink (Mustela vison) and habitat fragmentation on the water vole. - Journal of Applied Ecology 37: 475-490.

4 Bonesi, L. & Palazón, S. (2007). The American mink in Europe: Status, impacts, and control. Biological Conservation. 134. 470-483.

Several Member States have also prioritised biosecurity measures, such as improved fencing systems, to avoid mink escaping from fur farms. Strict rules with regard to containment measures and fencing protection of mink farms were implemented in Estonia in 2014.[5] To prevent the further expansion of feral American mink populations, Denmark - the world's largest producer of mink fur - introduced new legislation to improve fencing and increase the biosecurity of fur farms in 2015.[6]

The Fur Free Alliance notes that Regulation (EU) 1143/2014 explicitly states that species that are 'already established in the Union and have the most significant adverse impact' (Article 4 (6b)) should be prioritised for listing. The numerous preventive measures implemented at a Member State level and a substantial body of scientific research provides comprehensive evidence that the American mink is one of the most invasive alien mammals in Europe with a severe negative impact on European biodiversity.

The economic costs associated with the removal of American mink from the environment, or the reduction of their impact in Europe, are substantial. Complete eradication of a predator species, such as the American mink, without re-invasion from neighbouring countries or escapees from fur farms, is extremely difficult.[7][8] Preventive measures, recognised by the European Strategy on Invasive Alien Species as the most cost-effective method for dealing with invasive alien species, should therefore be prioritised, focusing on EU-wide biosecurity standards to avoid the further spread of the species due to fur farm escapes.[9]

To prevent further damage to native European biodiversity, there is an urgent need for concerted action at Union level and a strict permitting regime for existing commercial operations authorised under the terms of the Regulation (EU) 1143/2014. Inclusion of American mink on the Union list is crucial to establish a common perspective on preventive measures with regard to containment measures and biosecurity to avoid further dispersal of the species across Europe.

5 Mingi ja kähriku tehistingimustes pidamisele esitatavad täpsustatud nõuded ja farmi tegevusloa sisu täpsustatud nõuded (2014) https://www.riigiteataja.ee/akt/125112014011

6 Bekendtgørelse om husning af mink og hegning af minkfarme (2015) https://www.retsinformation.dk/eli/lta/2015/1422

7 Banks, P.B., Nordström, M., Salo, P., Fey, K. & Korpimäki, E. (2008) Impacts of alien mink predation on island vertebrate communities of the Baltic Sea Archipelago: review of a long-term experimental study. Boreal Env. Res. 13: 3-16.

8 Centre for Conservation Science (CCS)., Undated. Control of North American mink outside their native range.

9 Genovesi, P., Shine, C., European Strategy on Invasive Alien Species. Council of Europe publishing, Strasbourg.

Fur farming as a pathway of IAS introduction

The negative impact of the fur trade on biodiversity is not a recent phenomenon. Historically, it has been responsible for the depletion and even extinction of various fur-bearing species, including the sea mink. The traps used to catch wild animals are notoriously indiscriminate and can result in non-target species, some of which may be classified as endangered or threatened, being caught, injured or killed. Trapping can therefore put additional pressure on populations of animals that are already imperilled.

As an example of the fur trade's cavalier and irresponsible attitude towards the environment, all the big cats in the wild and many of their smaller cousins are now endangered and protected from further exploitation due, to a large part, to the excesses of the fur trade's past.

In addition to this, fur farming has also been an important pathway for the introduction of invasive alien species. American mink, raccoon dogs, muskrats and coypu are all non-native species that were originally introduced to Europe deliberately for the purposes of fur farming and have now established themselves in the wild. Such invasive alien species pose a significant threat to biodiversity and are recognised as such under the Convention on Biological Diversity. These four species have been placed on the list of 100 worst invasive alien species in Europe.[10]

In June 2017, the raccoon dog (Nyctereutes procyonoides) was the first species farmed for fur to be included on the List of Invasive Alien Species of Union Concern.

The introduction of American mink in Europe

The American mink (*Neovison vison*) is a semi-aquatic north American mustelid that has been farmed for its fur in Europe since the 1920s. Escapes from fur farms and deliberate releases resulted in feral populations across Europe. Today, wild populations have become established in more than 20 EU countries and the numbers are increasing.[11][12]

Extensive research on feral American mink demonstrate that the species mostly occur in areas where many mink are kept in farms. A Danish study estimated that 80% of free-roaming mink were fur farm escapees.[13] In Norway, a positive correlation was

10 DAISIE database: http://www.europe-aliens.org/speciesTheWorst.do (last accessed 05.11.2017)

11 Bonesi, L. & Palazón, S. 470-483.

12 Hegyeli, Z. & Kecskes, A. (2014) The occurrence of wild-living American Mink Neovison vison in Transylvania, Romania. Small Carnivore Conservation, 51: 23–28.

13 Hammershøj, M. (2004) Population ecology of free-ranging American mink Mustela vison in Denmark.

found between the expansion of the feral mink population and the development of Norwegian mink farming.[14]

A Dutch risk assessment of American mink as an alien invasive species commissioned by the Netherlands Food and Consumer Product Safety Authority (Ministry of Economic Affairs) states that feral mink in the Netherlands stem from constant escapes of fur farms and observations and by-catches of American mink occur almost exclusively in municipalities with fur farms.[15] In fact, the most probable cause for the American mink not having established a viable population in The Netherlands is the high intensity of muskrat controllers in the Netherlands.[16] By-catch data from the National Coordination Centre for Muskrat Control shows an average of 63 American mink caught annually by muskrat traps in the Netherlands between 2013-2016.[17]

As an opportunistic predator with a high reproduction rate the American mink is considered an effective invader. Capable of adapting to different climatic and landscape conditions the species is rapidly spreading throughout the EU, establishing populations in both northern and southern Europe. Unless effective measures are implemented, the American mink is expected to invade most of Europe in the near future.[18]

Economic impact of feral American mink

In specific regions, the economic costs caused by feral mink can be significant. Research on the economic damage of mink in the Outer Hebrides shows that American mink can cause considerable damage to salmon farming interests, free ranging chickens and the eco-tourist industry, through predation on ground-nesting birds.[19] Evidence shows that mink could account for a large proportion of salmonid mortality in some river systems.[20] Furthermore, the economic costs associated with the removal of American mink from the environment or the reduction of their impact are substantial.[21]

14 Bevanger, K. & Henriksen, G. 1995. The distributional history and present status of the American Mink (Mustela vison Schreber, 1777) in Norway. Annales Zoologici Fennici 32: 11–14.

15 Dekker, J.J.A. & Hofmeester, T.R. (2014) The status of the American mink (Neovison vison) in the Netherlands. Lutra, 57 (1): 5-15.

16 Dekker, J.J.A. & Hofmeester, T.R. 5-15.

17 National Coordination Centre for Muskrat Control (2014-2016) Annual reports 2014-2016 https://muskusrattenbestrijding.nl/#documenten (last accessed 05.11.2017)

18 Bonesi, L. & Palazón, S. 470-483.

19 Roy SS, Chauvenet ALM, Robertson PA. Removal of American mink (Neovison vison) from the Uists, Outer Hebrides, Scotland. Biological Invasions 2015.

20 Centre for Conservation Science (CCS)., Undated. Control of North American mink outside their native range.

21 Zabala, J., Zuberogoitia, I. & González-Oreja, J.A. (2010) Estimating costs and outcomes of invasive American mink (Neovison vison) management in continental areas: a framework for evidence based control and eradication. Biol. Invasions. 12: 2999-3012.

Insufficient precautionary measures at fur farms may have resulted in numerous escapes over the years, and large numbers have been caught in the vicinity of fur farms. We note that Article 4 (6) of Regulation (EU) 1143/2014 stipulates that updating the list will be done with due consideration 'to the cost of inaction'. We encourage the 'polluter pays principle' to be applied where liability can be established for the intentional or negligent release of invasive alien species into the environment.

Impact on biodiversity

The American mink is an invasive mammal with the highest impact on native species in Europe, negatively affecting nearly 50 native species, several of which are considered to be threatened.[22] Through competition, the American mink is a direct cause of the extinction of the last few remaining populations of the European mink.[23][24] It may also affect other small mustelids such as polecat and stoat.[25][26] In some EU Member States, American mink predate on another non-native species, the muskrat (*Ondatra zibethicus*). In the UK, predation by the American mink has been implicated as one of the main causes for the decline of water vole (*Arvicola amphibious*) populations along with habitat fragmentation.[27] There has also been concern across Europe about the impact of American mink on the breeding success of native birds and on domestic fowl.[28]

The American mink is perceived to be a voracious predator. Feral mink predation therefore also seriously impacts populations of small mammals, amphibians and fish

22 Genovesi, P., Carnevali, L., Alonzi, A. and Scalera, R. (2012) Alien mammals in Europe: updated numbers and trends, and assessment of the effects on biodiversity. Integrative Zoology, 7: 247–253.

23 Maran, T., Macdonald, D.W., Kruuk. H., Sidorovich. V., Rozhnov, V.V. (1998) The continuing decline of the European mink, Mustela lutreola: evidence for the intraguild aggression hypothesis. In: Dustone N, Gorman ML (eds) Behaviour and ecology of riparian mammals. Symposia of the Zoological Society of London, Cambridge University Press: 297–324.

24 Sidorovich, V. & MacDonald, D.W. (2001). Density dynamics and changes in habitat use by the European mink and other native mustelids in connection with the American mink expansion in Belarus. Netherlands Journal of Zoology 51(1): 107-126.

25 Sidorovich, V. & Solovej, I. (2007) The stoat Mustela erminea population decline in northern Belarus and its consequences for weasels Mustela nivalis. New Zealand Journal of Zoology 34:9-23.

26 Barrientos, R. (2015) Adult sex-ratio distortion in the native European polecat is related to the expansion of the invasive American mink. Biological Conservation. 186: 28-34. DOI: 10.1016/j.biocon.2015.02.030

27 Rushton, S. P., Barreto, G. W., Cormack, R. M., Macdonald, D. W. and Fuller, R. 2000. Modelling the effects of mink (Mustela vison) and habitat fragmentation on the water vole. - Journal of Applied Ecology 37: 475-490.

28 Birnbaum, C. (2006): NOBANIS – Invasive Alien Species Fact Sheet – Mustela vison. – From: Online Database of the North European and Baltic Network on Invasive Alien Species – NOBANIS www.nobanis.org,

across Europe.[293031] American mink may furthermore cause damages to small livestock, preying on chickens, rabbits and other small domestic animals.

Misrepresentation of the socio-economic value of the European fur industry

The socio-economic benefits of mink fur farming, as is routinely presented by the fur industry, are highly questionable and impossible to independently verify due to a lack of referenced sources.

Throughout the past decade there has been an ongoing and apparent shift towards a policy of non-transparency of the international fur industry by removing online sources of information and statistics worldwide.

To overemphasise its socio-economic value, the fur industry often presents outdated sales figures of lucrative years when the industry was at the peak of an economic bubble. The fact is that mink fur prices in Europe have plummeted since 2014.[3233] Prior to the collapse, increases in demand for fur in Russia and China had led to a dramatic increase in the price of mink pelts at auction – the industry benchmark. However, this led to enormous overproduction and an almost inevitable slump. This dramatic downturn is confirmed by the world's largest auction house, Kopenhagen Furs, which, in June 2016, reported that mink production had fallen from 72 million in 2015 to 54 million with the greatest decrease happening in China (18 million last year to 8 million in the current breeding/killing period).[34]

Figures presented with respect to employment in the industry are often unreferenced and highly unrealistic. A press release by the Belgian Association of Fur Farmers (BEFFA) on 14th May 2004 presented a highly exaggerated number of approximately 500 employees who are claimed to work either fulltime or part-time in the Belgian fur sector. There is no independent data to be found about the number of employees in Belgium, but a comparison with official figures of employment of the United States (approximately 3000 people on 438 farms in 1998/ 318 farms in 2002), Canada (15 employees in a company with 2300 breeding females) and the Netherlands (30 people, including managers, on 7 farms with 60000 breeding females) led to a more realistic estimation of their being less than 100 employees on Belgian fur farms.

29 Barreto, G. R., Rushton, S. P., Strachan, R. and Macdonald, D. W. (1998) The role of habitat and mink predation in determining the status and distribution of declining populations of water voles in England. Anim. Conserv. 1: 129–137.

30 Fischer, D. (2009) Predation of the alien American mink, Mustela vison on native crayfish in middle-sized streams in central and western Bohemia. – Folia Zool. 58: 45 – 56.

31 Ahola, M., Nordström, M., Banks, P.B., Laanetu, N. & Korpimäki, E. (2006) Alien mink predation induces prolonged declines in archipelago amphibians. Proc. R. Soc. B 273: 1261–1265.

32 https://www.theguardian.com/business/2014/oct/07/mink-prices-china-fur-sales

33 http://www.kopenhagenfur.com/da/om-os/dansk-pelsdyravlerforening-kopenhagen-fur/aarsberetninger

34 http://www.kopenhagenfur.com/da/om-os/dansk-pelsdyravlerforening-kopenhagen-fur/aarsberetninger

Member States, such as Denmark and the Netherlands, are often used as examples by the fur industry, when presenting socio-economic statistics of on fur farming, which gives a highly biased perspective considering these are two of the largest fur producers in Europe where much larger farms are operated than average. Additionally, the fur industry omits to mention that a legal prohibition on fur farming was passed in 2013 in the Netherlands, which will lead to the complete phase-out of fur farming by 2024.

The fact is that fur farming is an increasingly unstable industry, both economically and politically. In May 2017, German leaders voted for stricter animal welfare regulations that will make fur farming economically unviable and lead to the closure of German fur farms in 2023. More recently, in July 2017, the Czech Republic Senate voted with an overwhelming majority to prohibit the practice of fur farming starting 2019. The push to increase animal welfare and society's ethical concerns have led various EU Member States to prohibit fur farming (United Kingdom, Austria, Croatia, Slovenia, Republic of Macedonia) and/or phase-out fur farming (The Netherlands, Bosnia and Herzegovina, Serbia, Czech Republic), or introduce legislation that will render fur production commercially unviable (Germany). Even in Denmark, the heartland of the fur farming industry, legislators have taken steps to ban and phase-out fox farming on the grounds of animal welfare. These legislative decisions are based on scientific research on animal welfare, the public interest and ethical grounds. Furthermore, debates on fur farming bans are currently ongoing in Belgium, Luxembourg and Poland.

Fur farming is a minor agricultural sector in the European Union and employment opportunities on fur farms are relatively limited, and most often seasonal in nature. Employment on fur farms is most often part-time and carried out during killing and pelting season. Studies show that for many farmers in Europe, fur farming is a part-time business often combined with a cattle farm or other enterprise.[35] As the number of fur farms in many EU Member States is decreasing, the size of fur farms is increasing. However, larger fur farms do not necessarily lead to the creation of more jobs. [36] Furthermore, the closure of fur farms has not been seen to lead to unemployment.[37]

Conclusion

To safeguard local biodiversity, we would strongly urge EU Member States to ensure that the American mink is included on the List of Invasive Species of Union Concern

35 Hovland, I. & Boe, E. (2012) Pelsdyrhold i Norge- avvikling, arbeitsforbruk og selskapsform. Norsk institutt for landbruk-sokonomisk forskning, Kamne, U. & Franzén, A. (2014) Efter pälsfarmen – Undersökning av alternativa sysselsättningar. Miljöbyrån Ecoplan.

36 Besluit van de Deputatie van de provincie Oost-Vlaanderen, 15 maart 2007.

37 Hovland, I. & Boe, E.

as the potential further spread through fur farming represents a real threat beyond the species' current distribution.

Furthermore, Recommendation No 189 (2016) of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) reinforces the importance of inclusion of the American mink on the Union list to establish effective measures and avoid further dispersal.

The population size of introduced American mink in most countries is so large that complete eradication, without re-invasion from neighbouring countries or from fur farm escapes, is thought to be virtually impossible.[38] It is thus of utmost importance to focus on preventive measures and management activities on the farms themselves by increasing fencing and biosecurity to avoid farm escapes. The intentional release of animals by animal activists, a practice that is strongly opposed and condemned by the member organisations who make up the Fur Free Alliance, is an additional factor that needs to be addressed with respect to the implementation of security measures on fur farms.

We therefore encourage the Union to **apply a strict permitting regime to existing commercial operations** with regard to containment measures on mink farms authorised under the terms of Regulation (EU) 1143/2014. To prevent new sources of introduction and further dispersal of this highly invasive species, **no new mink farms should be permitted in the Member States that still allow fur farming, or new mink farms be established in Member States where no fur farms presently exist**.

It would be an outrage if a highly invasive species, such as the American mink, was not included on the Union list when such legislative measures have already been taken to protect the commercial interests of the fur industry.

Finally, we note that it is important for clear EU guidelines to be developed for Member States on the management of invasive alien species on the list, placing emphasis on humane or non-lethal control methods, which avoid or minimise pain, suffering and distress.

38 Centre for Conservation Science (CCS)., Undated. Control of North American mink outside their native range.