

FUR FARMING IN THE UK

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Fur farming became illegal in the UK in 2000. The *Fur Farming (Prohibition) Act 2000* ('the Act') prohibits the keeping of animals solely or primarily for slaughter for the value of their fur¹. The 'primary or solely' wording was originally intended to ensure that animals which, for example, provide leather or wool as a by-product, do not come under the legislation.² Therefore, the process of keeping animals primarily for their meat and selling their skins in addition remains within the law.

Whilst the intention behind the wording was not to exclude otherwise legal practices, it can also be employed to legalise what would otherwise be illegal under the Act. This is, perhaps, best demonstrated by looking at those animals who may be slaughtered both for meat and fur.

Recent applications have been submitted to open three intensive rabbit farming facilities in England; where at each, 250 female rabbits will produce upwards of 10,000 rabbits per year. In addition to providing meat, such farming practices also produce rabbit pelts and fur products³.

RABBIT FARMING CONDITIONS IN THE UK

HOUSING⁴

DEFRA has provided guidance on keeping farmed rabbits in the UK. In general, housing for farmed rabbits should be well ventilated, protected from the elements, designed to avoid injury to the rabbits and easy to clean. Outdoor housing should protect rabbits from predators, provide shelter from sun, rain and wind at all times, avoid draughts and provide dry bedding. There are also restrictions on the sizing of gaps in wired floors.

Rabbits over 12 weeks old need accommodation that is at least 45 cm high or 'at least high enough to let rabbits sit upright with their ears upright'.

Nest boxes for does and their young need a minimum length of 30 cm and a floor area of 0.08 square metres. The lowest side of the nest box should be at least 15cm with an entrance of at least 0.023 square metres to allow the doe to enter or leave but prevent the young from leaving prematurely.

¹ Fur Farming (Prohibition) Act 2000, s1(1).

² The Fur Farming (Prohibition) Bill HC Research Paper 00/4, 14 Jan 2000, p.34.

³ T&S Rabbits, 'Rabbit Products' <<http://tandsrabbits.co.uk/products.html>> accessed 31 August 2021.

⁴ Defra Guidance on Caring for Rabbits, 15 October 2015; Defra Codes of Recommendations for the welfare of livestock: rabbits, PB0080, 1987 (amended 1999); Welfare of Farmed Animals (England) Regulations 2007.

MINIMUM FLOOR SPACE FOR RABBITS KEPT IN CAGES

Rabbit type	Minimum area
Does and litter to 5 weeks old	0.56 square metres total area
Does and litter to 8 weeks old	0.74 square metres total area
Rabbits 5 to 12 weeks old	0.07 square metres per rabbit
Rabbits 12 weeks and older (other than those used for breeding) in multiple occupation cages	0.18 square metres per rabbit
Adult does and bucks for breeding	0.56 square metres per rabbit

MINIMUM FLOOR SPACE FOR RABBITS KEPT IN HUTCHES

Rabbit type	Minimum area
Does and litter to 5 weeks old	0.75 square metres total area
Does and litter to 8 weeks old	0.93 square metres total area
Rabbits 5 to 12 weeks old	0.009 square metres per rabbit
Adult does and bucks for breeding	0.75 square metres per rabbit

In addition, hutches or cages must be of a sufficient size to allow the rabbits to move around and to feed and drink without difficulty and to allow them to lie on their sides at the same time.

MANAGEMENT

Where it is necessary to mark rabbits for identification, tattooing is preferable to tagging which may result in damage to the ear. A ring above the hock may also be used.

All rabbits must be stunned before killed on farms. There is no minimum current for the electrical stunning of rabbits. After stunning, a method such as bleeding must be used to kill the rabbit. This must consist of cutting the two neck arteries properly

to make sure the rabbit bleeds out quickly and completely before regaining consciousness.⁵

It is unlawful for a person to cause unnecessary suffering to farmed rabbits.⁶

UK PRACTICES

In 2011, T&S Rabbits submitted planning applications to open six rabbit battery farms in the UK with the owner describing the environment as ‘light and airy... with hopes to retire the does after 4 – 5 years and give them away as pets’⁷. Following a public backlash, the owner changed his mind about the battery cages and instead proposed to make the rabbit farms ‘free-range’.⁸

An investigation carried out by Animal Aid this year, however, found the conditions to be less than the described ‘free-range’. Investigators found the rabbits in barren hutches unable to socialise and with no free access to the outside. The hutches were too small to allow the rabbits to sit upright with ears up or sit up on their hind legs.⁹ Whilst EU regulations and UK guidance exists on the sale of meat and poultry advertised as ‘free-range’, this does not, however, include rabbits.

In addition to providing rabbit meat, rabbit pelts and fur products, T&S Rabbits also sell live animals as pets. The guidance on housing for pet rabbits differs from those intended for slaughter.

MINIMUM ENCLOSURE SIZES FOR RABBITS SOLD AS PETS

Weight of rabbit	Maximum stocking density	Minimum floor area (m²)	Example dimensions (m) WxL	Minimum cage height (m)	Additional floor area for each additional animal (m²)
Up to 4 kg	4	0.4	1 x 0.4 or 0.8 x 0.5	0.4	0.1
4 – 6 kg	2	0.4	1 x 0.4 or 0.8 x 0.5	0.5	0.2
Over 6 kg	2	0.6	1 x 0.6 or 1.2 x 0.5	0.6	0.3

⁵ Defra Guidance on Slaughtering poultry, rabbits and hares on small scale farms, 16 October 2015; The Welfare of Animals at the Time of Killing (England) Regulations 2015, sch.4, para 5.

⁶ Animal Welfare Act 2006, s.4.

⁷ Damian Carrington, ‘Rabbit battery farms could return to UK’, *The Guardian*, 29 April 2011 <<https://www.theguardian.com/environment/2011/apr/29/rabbit-battery-farms-could-return>> accessed 11 August 2021.

⁸ Compassion in World Farming, ‘Proposed rabbit farms to be free-range’, 9 May 2011 <<https://www.ciwf.org.uk/news/2011/05/proposed-rabbit-farms-to-be-free-range>> accessed 11 August 2021.

⁹ Animal Aid, ‘Investigators find appalling conditions at rabbit farm in Derbyshire’, 1 April 2021 <<https://www.animalaid.org.uk/stoprabbitfarms/>> accessed 11 August 2021.

In addition to a prohibition on the use of slatted, grid or wire mesh floors, pet rabbits should have permanent access to a secure pen, suitable bedding and litter trays and a constant supply of fresh hay.¹⁰

Therefore, whilst it can be seen that guidance exists on the welfare of farmed rabbits in the UK, it may not always be followed.

RABBIT FARMING CONDITIONS IN EUROPE

Over 340 million rabbits are slaughtered every year for meat. The EU is the prime producer of rabbits in the world with the majority kept in battery cages.¹¹ Whereas there are minimum EU standards for the protection of pigs, calves, laying hens and broiler chickens, as well as the general Council Directive for the protection of animals kept for farming purposes, there is no specific EU legislation on minimum standards for the protection of farmed rabbits.¹²

Under EU law, the Union and its Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals.¹³ Existing EU legislation that applies to rabbits makes provision to ensure that keepers of animals take all reasonable steps to ensure the welfare of animals under their care and to avoid unnecessary pain, suffering or injury.¹⁴

HOUSING

There are no minimum standards for farmed rabbit housing and the majority are kept in tiny wire cages within large sheds containing 500 to 1,000 breeding does and 10,000 – 20,000 growing rabbits.¹⁵

TYPICAL FLOOR SPACE FOR RABBITS KEPT IN CAGES¹⁶

Rabbit type	Minimum area
Young rabbits	0.045 square metres total area
Does	0.24 square metres total area

¹⁰ Defra The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, Guidance notes for conditions for selling animals as pets, April 2020.

¹¹ European Parliament, Report on Minimum Standard for the Protection of Farmed Rabbits, AGRI Committee, 2016/2977(INI).

¹² *Ibid.*

¹³ Consolidated Version of the Treaty on the Functioning of the European Union [2008] OJ C115/13, Art.13.

¹⁴ Commission Directive 98/58/EC

¹⁵ Compassion in World Farming, Rabbit Welfare <<https://www.ciwf.org.uk/farm-animals/rabbits/rabbit-welfare/>> accessed 11 August 2021.

¹⁶ *Ibid.*

The European Food Safety Authority report into the welfare of rabbits farmed in different production systems found that the welfare of does, kits and growing rabbits is likely to be lower when kept in conventional battery cages. Concerns included: restriction of movement and resting; lack of gnawing behaviour and hunger; temperature stress; increased risk of disease, illness and death.¹⁷ Typically, breeding does die or are slaughtered and replaced each year and 30% of growing rabbits are killed before they're 12 weeks old.¹⁸

MANAGEMENT

Small establishments that produce rabbit meat are exempt from various EU slaughter and food standard regulations provided that fewer than 10,000 packs of meat are produced per annum and its sales are localised.¹⁹

All reasonable steps are required to be taken to ensure the welfare of animals, including knowledge requirements of operators in the slaughtering of rabbits.²⁰ Rabbits, however, are excluded from certain operational rules for slaughterhouses, including²¹:

- (i) 'Mammals, except rabbits and hares, which are not taken directly upon arrival to a place of slaughter, shall be lairaged';
- (ii) 'Mammals, except rabbits and hares, which are not taken directly to the place of slaughter after being unloaded, shall have drinking water available to them';
- (iii) 'It shall be prohibited to lift or drag the animals by the head, ears, horns, legs, tail or fleece, or handle them in such a way as to cause pain and suffering... the prohibition on lifting animals by their legs shall not apply to rabbits and hares'.

Rabbits may be slaughtered by a percussive blow to the head or electrical stunning, there is, however, no minimum current for electrical stunning in rabbits – the existence of which when used on other animals is to ensure that they do not regain consciousness during slaughter.

EU DEVELOPMENTS

In 2012, Austria banned the keeping of rabbits in cages for meat production. Barren cages and wire mesh floors are prohibited. Fresh gnawing material must be provided along with

¹⁷ European Food Safety Authority, 'Health and welfare of rabbits farmed in different production systems', *EFSA Journal*, Vol 18. Issue 1. January 2020.

¹⁸ *Ibid* n5.

¹⁹ Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing OJ/EU L303 24/9/2009, Arts.11, 17 and 25(2); Regulation (EC) No 853/2004.

²⁰ Council Directive 98/58/EC, 20 July 1998 concerning the protection of animals kept for farming purposes, Art.3.

²¹ *Ibid*.

hay or straw. The minimum flooring area for does, bucks and kittens is 6,000 cm² per pen with at least 50% available on ground level (to avoid stacking).²²

Belgium aims to phase out battery cages and replace them with park systems by 2025. Each park system must be at least 800 cm² and allow space for rabbits to perform three consecutive hops. They must contain 80% plastic flooring, gnawing blocks and tubes and a rack with permanent hay or straw.²³

Switzerland increased the size of enclosures based on the weight of the rabbits. At least part of the enclosures should be high enough for the rabbits to sit upright and have a darkened area for hiding. Suitable nesting material, coarse structured feed and objects for gnawing should be supplied daily.²⁴

In 2014, Germany legislated to improve animal welfare, specifically for rabbit farming with increased minimum cage dimensions.²⁵

In 2017, the European Parliament identified that existing European and national general laws regarding the breeding and fattening of rabbits for meat do not meet even the most basic animal welfare standards. It recommended EU legislation on minimum standards for the protection of farm rabbits including phasing out battery and wire cages, limiting transport and providing food and water when transported and for rabbits to be stunned before slaughter without the risk of them regaining consciousness.²⁶

Following the 'End the Cage Age' campaign, which saw 1.6 million signatures calling for a ban on caged farming in the EU, on 30th June 2021 the European Commission committed to revising current EU legislation by agreeing to:

- (i) Put forward a legislative proposal by the end of 2023 to phase out and prohibit the use of cages for rabbits and other farmed animals;
- (ii) Phase out of cages for farmed animals across Europe by 2027;
- (iii) Ensure that all imported products in the EU comply with future cage-free standards;
- (iv) To implement systems for incentives and financial support to European farmers during the transition to cage-free farming.

CONCLUSION

Rabbit fur is said to be the fastest growing section of the fur industry, with very few investigations carried out into the conditions faced by factory farmed rabbits.²⁷ They are also the third most popular pet; with around 900,000 currently kept in the UK²⁸. Like cats and dogs, they crave love, affection and stimulation. They are intelligent and sociable

²² Austrian Animal Welfare Act 2014; Austrian Consolidated Federal law, RIS Entire legislation for animal husbandry GBB1. II no. 485/2004.

²³ Royal Decree concerning the welfare of rabbits on farms, 29 June 2014.

²⁴ The Swiss Animal Protection Act 2005 and Swiss Animal Protection Ordinance 2008.

²⁵ Regulation on the protection of farm animals 2014.

²⁶ *Ibid* n1.

²⁷ CAFT, *The reality of commercial rabbit farming in Europe* <https://www.caft.org.uk/images/CAFT_Rabbit_Fur_Report.pdf> accessed 31 August 2021.

²⁸ RSPCA, *Rabbit Advice* <<https://www.rspca.org.uk/adviceandwelfare/pets/rabbits>> accessed 31 August 2021.

animals who bond for life with their companions. The wellbeing of a rabbit is affected so much by loneliness that there have been calls to follow on from Switzerland's lead and legislate to make it a requirement that they be sold or re-homed in pairs.²⁹ Breeding rabbits, however, are usually confined to separate cages and kept alone, this prevents them from carrying out their natural social behaviours such as grooming and taking comfort in a mate.

They are active animals that enjoy digging, exploring and the occasional binky. They can move a distance of two metres in two or three hops and can jump around one metre in height. Confining them to cages smaller than an A4 sheet of paper not only prevents activity but also leads to skeletal and various other health problems. Wire cages lead to sores on their feet and hocks, causing further unnecessary pain and suffering. Despite all of this, rabbits are still farmed for their meat and fur.

Animal welfare and public morality were the main factors in introducing the Act³⁰, yet this 'loophole' does little to alleviate those concerns. Public response can be seen in the petitions to refuse the applications for the proposed rabbit farms³¹, with two of the three proposals being rejected thus far and the third – still outstanding - being one of the most signed petitions on Change.org.

It cannot be that Parliament had envisaged an Act prohibiting fur farming would, in fact, provide a means for its preservation.

²⁹ British Veterinary Association, '*Pet rabbits should be housed in compatible pairs of groups*' <<https://www.bva.co.uk/take-action/pet-rabbits-pairs-or-groups/>> accessed 31 August 2021.

³⁰ HC Deb 15 May 2000 vol 350 cc40-77, para 41.

³¹ Change.org, '*Refuse planning for an intensive rabbit farm in Rutland*' <<https://www.change.org/p/rutland-borough-council-refuse-planning-for-an-intensive-rabbit-farm-in-rutland>> accessed 19 July 2021.