

To:
European Commission
Directorate-General for Environment
Rue de la Loi 200
1049 Brussels
Belgium
Date:
29.09 2025

**Subject: Formal Opposition to the Danish Government's Request for
Exemption from
Regulation (EU) No 1143/2014 Concerning the Farming of American Mink
(Neogale vison)**

Dear Members of the European Commission,
We respectfully submit this letter to formally oppose the Danish Government's application for an exemption under Article 9(1) of Regulation (EU) No 1143/2014 on the prevention and management of the introduction and spread of invasive alien species. The exemption seeks to permit the continued farming of American mink (*Neogale vison*), which has been listed as an invasive alien species of Union concern under Implementing Regulation (EU) 2022/1203.

Overview of the Situation

The exemption concerns only 11 individual mink farmers, several related to each other, across five locations in Denmark. These operations contribute no significant economic value to the Danish public and hold no measurable importance to the national workforce. The industry exists only as a legacy operation, subsidised during the COVID-19 transition period, and no longer serves any strategic, scientific, or cultural interest justifying exemption.

A recent YouGov survey reveals that 62 % of Danes believe the fashion industry should completely cease using fur, while only 19 % support its continuation. This

broad public consensus underscores that maintaining fur production is not aligned with current Danish societal values or Danish animal welfare principles.¹

We hereby present counter arguments against each point required for such an application, in accordance with Article 9(4) of the Regulation.

Counterarguments to Required Elements of the Exemption Application:

(a) Details of the Establishments:

The exemption applies to a small, private sector 11 individuals. The negligible size and lack of public interest fundamentally undermine any claim of significance or necessity.

In its opinion of 1 November 2021, the Danish Animal Ethics Council concluded that mink farming, as currently practised in Denmark, does not meet animal welfare standards. The Council found that the production form, characterised by severe spatial restriction, lack of environmental enrichment, and high stress levels, cannot be ethically justified in its present structure.²

And just recently 2 of the mink farmers were investigated for animal abuse after footage and images from June 2025 were published from their farm³.

(b) Species Concerned:

The species in question, *Neogale vison*, is officially listed as an invasive alien species of Union concern. Its known ecological impacts include the destruction of native bird populations, amphibians, and small mammals. This status legally obliges Member States to prohibit its keeping, breeding, and release.

(c) Combined Nomenclature Codes:

These are irrelevant to the exemption criteria. They serve administrative functions only and cannot be considered justification under Article 9.

¹

<https://via.ritzau.dk/pressemeddelelse/13657941/dumt-og-dyrt-at-genoptage-minkavl?publisherId=13560081>

² <https://detdyreetiskeraad.dk/Media/638542059682578465/Udtalelse%20om%20minkproduktion.pdf>

³ <https://oasa.dk/afsloring-af-minkfarme-2025/>

(d) Volume of Specimens:

The captive mink currently held in 5 separate locations across the country represent an ongoing biological risk. A small number of escapees are sufficient to maintain or expand established feral populations, threatening protected EU habitats.

(e) Reason for Authorisation:

The claimed justification appears to be economic continuity. However, the fur sector no longer holds cultural or economic relevance in Denmark. This private interest does not meet the exemption criteria of public health, vital research, or environmental conservation.

Since the reopening, the Danish mink industry has limited macroeconomic significance:

Export revenues are less than half of their pre-COVID level and account for under 0.1% of total Danish goods exports.

- Employment has shrunk from thousands to a double-digit number of jobs.
- The state continues to bear a significant financial burden from compensation⁴ and environmental cleanup, while the value chain increasingly takes place abroad.
- A comparison vital Danish sectors contribution to gross national product (BNP), wind energy and pharmaceutical, shows that while mink fur trade is estimated to contribute to a maximum 0.06% while wind contributes 1,5%⁵ and pharma contributes 5,7%.
- Of the estimated DKK 1.8⁶ billion in export earnings in 2023, a significant share stemmed from pre-COVID stock—surplus pelts accumulated in earlier years. Consequently, export revenues are expected to decline markedly once Copenhagen Fur's remaining inventory is depleted.

(f) Containment Measures:

The historical record in Denmark shows persistent failure in preventing mink escapes, despite biosecurity protocols. Existing feral populations are the direct

⁴ <https://fvm.dk/nyheder-og-pressemeddelelser/2025/jan/nyt-skoen-over-udgifter-til-minkerstatninger>

⁵ <https://stateofgreen.com/en/news/the-economic-benefits-of-wind-energy/>

⁶ <https://trendeconomy.com/data/h2/Denmark/430110>

result of past containment failures. In the absence of farms the feral populations of Sealand and Jutland are projected to decline and die out due to insufficient survival rates.

(g) Risk Assessment and Mitigation: Independent assessments confirm high ecological risk⁷. Previous mitigation efforts were insufficient and failed to prevent feral colonisation. Maintaining even a reduced industry sustains this risk. An investigation by a Danish animal welfare organisation in June 2025 confirmed mink outside of their cages, both dead and alive⁸, proving again that the current system is incapable of preventing minks from escaping from the cages.

(h) Surveillance and Contingency Planning:

Surveillance has not been able to prevent or control mink populations. Eradication efforts are slow, expensive, and rarely complete. Allowing farming to continue increases the burden on public resources and environmental authorities.

(i) Relevant National Law:

National law may not conflict with or override EU regulation. The Danish Government is required to align national practice with Regulation (EU) No 1143/2014. Exempting a commercial fur operation for an invasive species undermines this obligation.

Final Position

In conclusion, the Danish exemption application:

- Fails to meet the scientific or public interest conditions required under Article 9(1);
- Represents a private commercial interest with no strategic value to Denmark or the Union;
- Contradicts the objectives of the EU Biodiversity Strategy 2030 and the Green Deal;
- Undermines the enforcement and integrity of Union law on invasive species.

⁷ <https://mst.dk/media/o0aamjau/amerikansk-mink.pdf>

⁸ https://drive.google.com/drive/u/0/folders/1YGtxBAYXg_en6Yu8BPJU-UT_5gZn1Yzp

We therefore urge the Commission to reject the application for exemption and reaffirm the legal, ecological, and ethical principles that guided the inclusion of Neogale vison on the Union list.

Thank you for your consideration



Greenpeace

World Animal
Protection

OASA

Dansk Vegetarisk
Forening

Anima



Dyrenes Venner



DOSO



Dyrenes Alliance



Dyrenes Detektiv