

Shri Md. Moin Afaque  
Joint Director General of Foreign Trade  
Directorate General of Foreign Trade  
Ministry of Commerce and Industry  
Vanijya Bhawan, 'A' Wing  
16, Akbar Road  
New Delhi- 110011  
Government of India

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
INDIA

PETA India  
PO Box 28260  
Juhu, Mumbai  
Maharashtra 400049  
022 40727382

Info@petaindia.org  
PETAIndia.com

11<sup>th</sup> August 2024

**Subject: PETA India Recommendations With Regards to Harmonization of Chapters 40 to 98 of Schedule-II (Export Policy) to ITC (HS) codes - Trade Notice no. 11/2024-25**

Dear Sir,

I am writing to you on behalf of People for the Ethical Treatment of Animals (PETA) India and our more than two million members and supporters to submit our recommendation with regards to the trade notice cited above. We submit our recommendations concerned about potential violations of the Wildlife Protection Act (WPA) 1972, disregard of Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES) and encouragement of the illegal wildlife trade as any permission for wildlife products to be traded also encourages the illegal trade.

The issues highlighted are as follows:

**1. Raw Hides and Skins of Reptiles (Chapter 41):**

- **Clause 41032000:** This clause proposes to allow the export of raw hides and skins of reptiles. We recommend prohibiting this trade to protect wildlife, to respect the WPA 1972, and due to significant public health risks and the extreme cruelty involved in obtaining these materials.

**2. Tanned Crust Hides of Reptiles (Chapter 41):**

- **Clause 41064000:** The export of tanned reptile hides from reptiles is permitted. We urge that this clause be amended to protect wildlife, to respect the WPA 1972, and prevent the perpetuation of inhumane practices and reduce zoonotic disease risks.

**3. Leather Further Prepared from Reptile Skins (Chapter 41):**

- **Clause 41133000:** Leather prepared from reptile skins is also allowed for export. We propose that this trade be

Entities:

- PETA US
- PETA Asia
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (UK)

Registered Office:

F-110, First Floor, Jagdamba Tower  
Plot No 13, Community Centre  
Preet Vihar, New Delhi  
Delhi 110092

prohibited to protect wildlife, to respect the WPA 1972, and to align with ethical treatment standards for wildlife and to safeguard public health.

**4. Raw Furskins of Mink (Chapter 43):**

- **Clause 43011000:** This clause permits the export of raw furskins of mink, an animal known to transmit bird flu and COVID-19. We recommend an immediate ban on this trade to prevent further public health risks and to end the cruel practices associated with mink farming. Fur farming is prohibited in numerous countries.

**5. Raw Furskins of Fox (Chapter 43):**

- **Clause 43016000:** The export of raw furskins of fox, a species protected under the WPA, 1972 and CITES, is allowed. We urge that this clause be revised to protect these animals and prevent illegal trade activities.

**6. Articles of Apparel and Clothing Accessories Made from Wild Animal Fur (Chapter 43):**

- **Clauses 43031010, 43031020:** These clauses allow the export of apparel and accessories made from the fur and any other part of wild animals, despite the fact that any wildlife trade encourages illegal wildlife traders and the protection conferred to them under WPA, 1972 and CITES. We oppose this proposal and request that India's commitment to wildlife conservation be upheld by prohibiting the trade in wildlife.

Under Chapter 41(Raw Hides and skins) & 43 (Furskin and artificial leather, manufactures thereof), all the trade in reptile and furskin has been made free. We strongly object to the free trade in wildlife and products made of wildlife skin for the following reasons:

- It is illegal to capture and kill animals protected under the WPA, 1972 and numerous wild animals also have CITES protection.
- The existence of the wild animal trade supports the illegal trade in wildlife products. Without a DNA test, it is not possible to tell whether the fur or skin really came from a permitted or threatened species.
- Fur Farms: Animals are confined to cramped, filthy cages and killed using methods like suffocation, electrocution, gassing, and poisoning.

- **Reptile Slaughter:** Snakes are skinned alive, lizards decapitated while conscious, and crocodiles and alligators stabbed and often skinned alive.
- **Zoonotic Disease Risks**—for instance, mink are susceptible to Covid-19 and bird flu.
- **Environmental Impact:** Killing of animals contributes to pollution from harsh chemicals used to prevent the skin and fur from decomposing and comes with a high carbon footprint.
- **Declining Demand:** Increased awareness of animal welfare and environmental concerns, and the rise of sustainable and eco-friendly materials is leading to declining consumer preference for wildlife and other animal products.

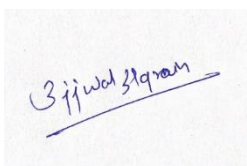
This letter is accompanied by **Annexure-1** that outlines the specific sections and clauses of the policy that we recommend for immediate amendment.

Many European nations, where fur farming was once standard, have prohibited fur farming. Specifically, fur farming has been banned in 19 European countries, 14 of which are EU member states. These include Austria, Belgium, Bosnia and Herzegovina, Croatia, the Czech Republic, Estonia, France, Italy, Ireland, Latvia, Luxembourg, Malta, the Netherlands, North Macedonia, Serbia, Slovakia, Slovenia and the UK.

Numerous major brands have policies against the sale of exotic skins such as from reptiles and snakes. They include Chanel, Nike, Macy's, Asos, H&M, Hugo Boss and many others.

We kindly request that you review the annexure and consider our recommendations for the necessary amendments to the Export Policy. Should you wish to contact, my email is [uagrain@petaindia.org](mailto:uagrain@petaindia.org), mobile: 9971075382.

Sincerely,

A handwritten signature in blue ink that reads "Ujjwal Agrain" with a horizontal line underneath.

Ujjwal Agrain  
Senior Policy Advisor

**Annexure 1**

**PETA India's comments on Chapters 40 to 98 of Schedule-II (Export Policy) of ITC(HS) 2022**

S.No	Chapter number & name	ITC-HS Code	Description	As proposed in the draft policy (2024)	PETA India's Recommendation	Comments / Reason
<b>Chapter 41: Raw Hides &amp; Skins (Other than Furskins) and Leather</b>						
1	41- Raw Hides and skins (other than furskins) and leather	41032000	Raw hides and skins - Of reptiles	Free	Prohibited	India's reptiles are protected under the Wildlife Protection Act,1972 (WPA) Killing of reptiles is cruel. Snakes are skinned alive, lizards decapitated while conscious, and alligators and crocodiles stabbed and often skinned alive.
2	41 - Raw Hides and skins (other than furskins) and leather	41064000	Tanned or crust hides and skins of reptiles	Free	Prohibited	The reptile and wild animal trade poses a zoonotic disease risk. The zoonotic diseases associated with reptile and amphibian contact include Salmonella, Mycobacterium, Campylobacter, Aeromonas, Escherichia coli, Klebsiella, Serratia and Flavobacterium meningosepticum. Often these infections can cause serious illness in humans.
3	41- Raw Hides and skins (other than furskins) and leather	41133000	Leather further prepared after tanning of reptiles	Free	Prohibited	
<b>Chapter 43: Furskins And Artificial Fur; Manufactures Thereof.</b>						
4	43- Furskin and artificial leather, manufactures thereof	43011000	Raw Furskins: Of mink, whole, with or without head, tail or paws	Free	Prohibited	Countries around the world have banned or are in process of banning fur farming. Minks are known to transmit COVID-19 and bird flu, and their farming involves inhumane practices.
5	43- Furskin and artificial leather, manufactures thereof	43016000	Raw Furskins: Of fox, whole, with or without head, tail or paws	Free	Prohibited	Foxes are protected under the Schedule II of Wildlife Protection Act of 1972 in India. The Act provides special protection to listed animals, prohibiting their hunting and trade.
6	43- Furskin and artificial leather, manufactures thereof	43031010	Articles of apparel and clothing accessories: Of wild animals covered under the Wild Life (Protection) Act, 1972	Free	Prohibited	The proposed free trade and exportation of wildlife, including species protected by CITES, poses a significant risk to our planet's biodiversity. Such actions contravene the aim of the WPA, 1972. Allowing exports of wild and CITES protected animals undermines conservation efforts as any wildlife trade encourages illegal wildlife trade and risks the spread of zoonotic diseases. There is a growing consumer trend towards vegan preferences. The shift is driven by desires to safeguard natural resources, animals and their welfare.
7	43- Furskin and artificial leather, manufactures thereof	43031020	Articles of apparel and clothing accessories: Of animals covered under Convention on International Trade of Endangered Species (CITES), Other than those of Tariff item 43031010	Free	Prohibited	
8	43- Furskin and artificial leather, manufactures thereof	43039010	Other: Articles of apparel and clothing accessories: Of wild animals covered under the Wild Life (Protection) Act,1972	Free	Prohibited	
9	43- Furskin and artificial leather, manufactures thereof	43039020	Other: Articles of apparel and clothing accessories: Of animals covered under Convention on International Trade of Endangered Species (CITES), other than those of item 4303 90 10	Free	Prohibited	