

Exhibit G

**Public correspondence received as of
March 3, 2021**

Roxann B Borisch

Subject: Add Farmed Mink to State Prohibited Species List

From: Robert E. Rutkowski <r_e_rutkowski@att.net>
Sent: Monday, January 18, 2021 8:49 AM
To: odfw.commission@state.or.us
Cc: Keith Abouchar <keith.abouchar@mail.house.gov>
Subject: Add Farmed Mink to State Prohibited Species List

Curt Melcher, Director
Commission Members
Oregon Department Of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302
Main Phone (503) 947-6000 or (800) 720-ODFW [6339]
Email: odfw.commission@state.or.us

Re: Add Farmed Mink to State Prohibited Species List

Dear Director:

The Center for Biological Diversity filed a rulemaking petition asking the Oregon Department of Fish and Wildlife to add mink to the state's prohibited species list.

The petition follows Tuesday's announcement that two of three trapped mink believed to have escaped from a quarantined, 12,000-animal mink fur-farming operation have tested positive for COVID-19 and that the virus continues to spread within the facility.

Adding mink to the prohibited species list would prohibit the possession of live mink in Oregon unless a facility can demonstrate that it can prevent escapes, minimize the spread of disease, and take good care of the animals.

With COVID-19 infected mink continuing to escape from this quarantined, COVID-infected facility it's obvious that this industry poses far too great of a threat to wildlife and public health to allow it to continue to operate as is. State wildlife regulators should do their job and take the action necessary to ensure that infected mink don't spread this deadly virus to wild animals.

Mink are members of the mustelid family, which in Oregon includes native mink, federally protected Humboldt martens, Pacific fishers, wolverines, ermines, long-tailed weasels, American badgers and river otters. In addition to concern that COVID-19 infected mink escaped from commercial fur operations could infect other mustelids, the Center is also concerned that they could infect their predators, such as American bald eagles, great horned owls, coyotes, bobcats and wolves.

There is also the risk that prey, such as ducks, mice and rabbits, that escape the clutches of an infected mink could contract and further spread the virus. In these ways, the spread of COVID-19 from infected mink could potentially lead to deadly outbreaks in the wild and wild animal reservoirs of the virus.

There are 11 permitted fur-rearing operations in Oregon, with approximately 438,000 total animals. For a fur-rearing facility to require a permit in Oregon, it must hold more than 10,000 animals. There are an unknown number of smaller mink-rearing operations in the state.

We know farmed mink in Oregon keep getting infected by the coronavirus, and we know they keep escaping into the wild. The only question that remains is, how devastating will Oregon allow the consequences to be? The hope is that state officials act fast on this petition so that wildlife don't have to pay a terrible price for their inaction.

Yours sincerely,
Robert E. Rutkowski

cc:
Legislative Correspondence Team
Longworth House Office Building
Washington DC 20515
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2527 Faxon Court
Topeka, Kansas 66605-2086
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E-mail: r_e_rutkowski@att.net

Background

On Nov. 6, weeks before the recent outbreak, the Center wrote to the Oregon agencies urging them to take active measures to ensure that COVID-19 was not spreading at Oregon's mink facilities. That letter followed news that Denmark, the world's largest mink producer, planned to kill more than 15 million mink after COVID-19 transmission between humans and mink resulted in hundreds of people being infected with COVID-19 from mink, including with strains containing mutations that originated in the mink. COVID-19 can spread bi-directionally between humans and mink.

On Nov. 19 Oregon state agencies responded by refusing to commit to any specific actions to stem the unique threat from mink operations. That same day Oregon recorded its first reported cases of mink experiencing COVID-19 symptoms.

The Center followed up with a Dec. 1 letter detailing how, after refusing to do proactive testing at mink operations, state officials had also refused to release basic information it routinely releases following workplace outbreaks, including the name and location of the facility and the number of people infected. That failure potentially jeopardized public health and contact tracing efforts.

COVID-19 has hit mink-production facilities across the country. Since August the U.S. Department of Agriculture has announced confirmed cases of COVID-19 in mink-rearing operations in Utah, Wisconsin and Michigan, with at least 15,000 mink succumbing to the virus. A wild mink in Utah that tested positive for COVID-19 last month is thought to be the first wild animal to be infected with the virus.

Like factory farms that raise animals for food, mink-farming operations have long been known for the risk they pose to the environment, biodiversity and public health. Factory farms and the international wildlife trade are leading breeding grounds for novel and dangerous pathogens like COVID-19.

Roxann B Borisch

From: Michelle Tate
Sent: Wednesday, January 27, 2021 9:34 AM
To: Thomas Thornton
Cc: Roxann B Borisch
Subject: FW: Indigenous Fur Harvesters Speak Out Against Anti-Fur Campaigners (01-2021_Mink)

From: Stan Steele <riverrunguide@yahoo.com>
Sent: Wednesday, January 27, 2021 9:27 AM
To: ODFW Commission <odfw.commission@state.or.us>; Curt Melcher <curt.melcher@state.or.us>; Shannon Hurn <Shannon.M.Hurn@coho2.dfw.state.or.us>; Douglas Cottam <douglas.f.cottam@state.or.us>; Derek J. Broman <derek.j.broman@state.or.us>; REP Williams <Rep.AnnaWilliams@oregonlegislature.gov>; REP Post <Rep.BillPost@oregonlegislature.gov>; REP Witt <Rep.BradWitt@oregonlegislature.gov>; REP Marsh <Rep.PamMarsh@oregonlegislature.gov>; Zach Hudson <rep.zachhudson@oregonlegislature.gov>; Jami Cate <rep.jamicate@oregonlegislature.gov>; REP Reardon <Rep.JeffReardon@oregonlegislature.gov>; REP SmithD <Rep.DavidBrockSmith@oregonlegislature.gov>; REP Breeselverson <Rep.VikkiBreeselverson@oregonlegislature.gov>; Rep McLain <rep.susanmclain@state.or.us>
Cc: Doug Nichol <doug@tgnicholplumbing.com>; Jim Soares <jims@eoni.com>; Donnie Nichols <dcnichols2010@gmail.com>; Don & Sandy Nichols <papatrapperdon@canby.com>; Ed Minalia <eminalia@gmail.com>; jeffcomini@aol.com; Scott Wood <skotwould@gmail.com>; John Daniel <johndanielgc@gmail.com>; David Hastings <davechastings@gmail.com>; Gary Leistico <gleistico@rinkenoonan.com>; Jenny Dresler <jenny@pacounsel.org>; Mary Anne Cooper <maryannecooper@oregonfb.org>; Stan Steele <riverrunguide@yahoo.com>; Dave Wiley <davewiley@wvi.com>; Joel Strimling <canoeloha@gmail.com>; Bev Hanson <otabev2015@aol.com>; Jacob Hupp <jhupp@sportsmensalliance.org>; Aoibheann (A-veen) Cline <acline@congressionalsportsmen.org>; Kyle Williams <kyle@ofic.com>; Jerod Broadfoot <broadfoot9@mac.com>
Subject: Fw: Indigenous Fur Harvesters Speak Out Against Anti-Fur Campaigners

Good Morning Everyone,

I thought the following message from our northern indigenous brother and sister furbearer harvesters would be of interest to each of you. The recent submission to the Oregon Department of Fish and Wildlife of a petition to ban mink farming and introduced legislation, Oregon House Bill 2676, that prohibits the sale, offer for sale, display for sale, trade or other distribution for consideration of fur products in Oregon, if passed and signed into law would essentially end Oregon's economically and recreationally important furbearer industries and furbearer management programs. The Oregon Trappers Association would appreciate discussing the merits of the petition and HB2676 with each of you in your respective positions as Oregon Fish and Wildlife Commissioners and as members of the House Agriculture and Natural Resources Committee.

Oregon's furbearer harvesters appreciate how busy your schedules are, especially during these unsettling times caused by the pandemic. We look forward to you taking a few minutes of your valuable time to allow us to share our view points on these extremely important and controversial topics.

Please feel free to contact me when you get a free moment!

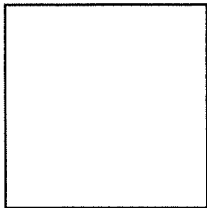
Thank you and have a great day!

Keep Oregon Hunting, Fishing, Trapping and Sport Shooting,

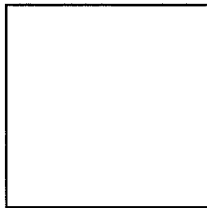
Stan Steele
Oregon Trapper's Association
541-752-8350

----- Forwarded Message -----

From: Truth About Fur - The Blog <info@truthaboutfur.com>
To: "riverrunguide@yahoo.com" <riverrunguide@yahoo.com>
Sent: Wednesday, January 27, 2021, 06:01:11 AM PST
Subject: Indigenous Fur Harvesters Speak Out Against Anti-Fur Campaigners



Indigenous Fur Harvesters Speak Out Against Anti-Fur Campaigners



The following statement from the four signatories below was released to the media on Jan. 24, 2021.

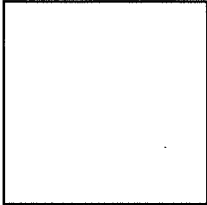
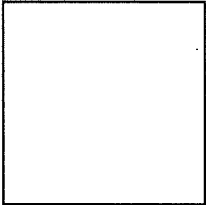
"Harvesting and trading fur and other gifts of nature is our inherent right since ancient times, not a privilege to be bartered or revoked!" says Chief Brian Wadhams, trapper, of the 'Namgis First Nations.

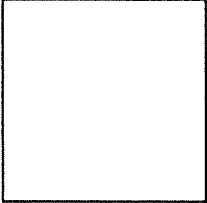
As Indigenous trappers and traditional trapline holders, we can no longer remain silent about self-appointed "animal rights" activists who think they have a right to spread lies about the fur trade and call on politicians to ban the production or sale of fur products.

The latest example of this vicious and misleading campaigning is a recent call by animal activists for the Canadian Government to ban mink farming, after mink on two BC farms tested positive for COVID-19. While mink farming is not a tradition in our culture, we oppose this attack on small family-run farms and

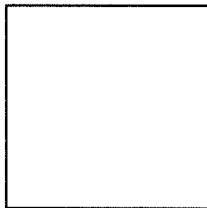
on rural communities where the majority of Indigenous harvesters live. And we are not naïve: we understand that this attack on mink farming is just the latest weapon in an orchestrated plan to turn the public against any use of fur – a campaign that directly attacks our culture and inherent rights as Indigenous peoples of Canada. We call this for what it is: Cultural Genocide.

[READ THE REST OF THE BLOG POST](#)

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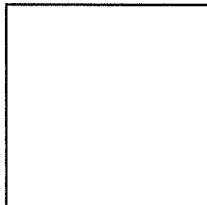
 **FORWARD**

From the archive



**Amazing Facts About Fur:
Dressing for the Arctic**

by Simon Ward, contributing editor,
Truth About Fur



**Neal Jotham: A Life Dedicated
to Humane Trapping**

by Alan Herscovici, senior researcher,
Truth About Fur



FUR COMMISSION USA

POST OFFICE BOX 1532 MEDFORD, OREGON 97501
TEL 541.595.8568 FAX 541.566.7489
WWW.FURCOMMISSION.COM

February 8, 2021

Dr. Doug Cottam
Oregon Department of Fish and Wildlife

Re: Center for Biological Diversity's petition to the Oregon Department of Fish and Wildlife to initiate a rulemaking to amend OAR 635-056-0050 to add mink to the Prohibited Species List.

Dear Doug,

We write today to correct the record and rebut many of the elements of the Center for Biological Diversity's (CBD) petition to the Oregon Department of Fish and Wildlife (ODFW) to Initiate a Rulemaking to Amend OAR 635-056-0050 to Add Mink to the Prohibited Species List.

As a threshold matter, we find that the petition falls outside of the ODFW's jurisdiction, as regulation of mink farms is a function of the Oregon Department of Agriculture (ODA).

Furthermore, we would like to point out that petitioner, CBD, is an Arizona-based activist organization that opposes traditional farming practices and most animal use. They are not experts in animal husbandry, zoonotic disease or the farming of mink. Accordingly, the petition contains many generalizations, exaggerations and false information.

Jurisdictional Authority

The Oregon Department of Fish and Wildlife ("ODFW") does not possess the statutory authority to add "mink" to its Prohibited Species list at Oregon Administrative Rule ("OAR") 655-056-0050, as the Center for Biological Diversity's petition requests. Rather, ODFW's regulatory authority for mink is statutorily limited by the Oregon Department of Agriculture's jurisdictional authority to regulate domesticated mink, including the management of disease outbreaks in these species.

ODFW is charged with, among other things, the regulation of wildlife. "Wildlife," as defined in statute, includes "wild mammals" as further defined in OAR 635-057-0000. As the regulations make clear, jurisdiction over particular forms of "wildlife" may fall under the jurisdiction of other State agencies, including ODA. With regard to mink, ODFW's sole authority to regulate such species is limited to: (i) those animals existing in a wild state, or (ii) those animals privately possessed, in a quantity of no more than ten, for non-commercial purposes. This authority provides ODFW with oversight in managing the commercial hunting season for mink and with regard to the capture, transfer, and possession of wild mink as "pets." See OAR 635-044-0420(30). In such instances, ODFW may take necessary actions to control disease outbreaks that are an imminent danger to the public, wildlife, domestic animals, or livestock health. OAR 635-044-0590. However, all other oversight pertaining to mink, including commercial use, falls under the authority of ODA. See OAR 635-044-0440(12)

("[M]ink (*Mustela vison*) may be held by a commercial fur farm under authority of the Oregon Department of Agriculture."); *see also*, OAR 635-056-0010(3) (which defines a "Commercial Fur Farm" as "any operation which raises...mink (*Mustela vison*) for profit and possesses 10 or more animals.").

Under Oregon Revised Statutes Chapter 596, ODA retains sole authority to supervise, control, and eradicate the spread of infectious diseases affecting livestock, including those transmissible with humans. O.R.S. § 569.020(1). "Domesticated fur-bearing animals" are included in the statute's definition of "livestock," *Id.* § 596.010(3), and "[t]he breeding, raising, producing in captivity and marketing of...mink" is defined as "an agricultural pursuit," *Id.* § 596.020(2), one which is subject to the strict oversight of ODA. Indeed, as the law makes clear, "[s]uch animals [*e.g.*, domesticated mink] are not within the purview of the state game laws." *Id.* Simply put, CBD's petition for rulemaking is a request for ODFW to regulate an industry that clearly falls outside of its purview.

FCUSA Response to Petition's Allegations and Misrepresentations:

- **Mink populations worldwide have not been "ravaged"**. In fact, the recent outbreak in Oregon that was detected in early November was contained and controlled, and no new outbreaks have occurred since. While mink, like ferrets, are susceptible to the virus, it is not generally lethal and no mink died on the Oregon farm in question.
- **There is no proven scientific evidence of any mink-to-human transmission.** Mink-related strains were identified in 214 workers in Denmark last summer, but it is unclear how they were infected. The Cluster 5 mutation that surfaced was suspected of transmitting to 12 of these¹, however, transmission from mink was not confirmed and the mutation is now considered extinct.²
- **Mink escapes are rare**
Historically, the most common cause of mink being released into the wild is eco-terrorism – animal activists who trespass onto farms and open the pens as part of an "animal liberation" effort. For a mink to escape the farm on its own, however, it must first escape the mink shed, where nets are in place to capture any that escape their pens and then breach the farm's perimeter fence, put in place to keep predators and other wildlife off the farm as a biosecurity measure. This does not mean that an occasional animal does not escape during certain production phases when they are moved between pens or out of the sheds, but it is rare and generally involves a single animal. In Oregon this year, 3 of 12,000 mink escaped, likely ascribable to a scaled back workforce due to Covid protocols in place to protect the animals.
- **There is no evidence that escaped mink have introduced the virus to other wildlife**
In fact, testing of at least 25 animals of 9 different species trapped in the vicinity of mink farms have detected no virus.³ On a practical note, mink are solitary animals by nature, and are extremely territorial. Even if released to the wild, the only occasions where a mink would approach another mink would be to kill it (territorialism) or mate (only during a short period in Spring)
- **American Mink Are Farmed in Accordance with Industry Best Practices and Subject to Rigorous Certification**
Allegations of substandard housing and care are a "one size fits all" common allegation of animal activists who generally have no knowledge of animal husbandry, best practices or animal management. This petition is no different. Petitioner paints a picture that is a gross misrepresentation

of mink farming and, more importantly, is subjective, misrepresentative and irrelevant to the petitioner's request. We invite Commissioner's to meet with us to learn more about FCUSA's farm certification processes⁴ and to visit one of Oregon's exceptional mink farms to see first-hand how these multi-generational animal experts manage their operations.

- **American Mink are Prized throughout the World for their Quality**
While the fashion and luxury market ebbs and flows from year to year due to a myriad of outside influences, fur and especially American produced mink continue to be prized around the world for their quality and versatility. American mink is an important agricultural export and remains in demand.
- **The Petition places Oregon's family farms and trappers at economic risk**
Adoption of the Petition would impact Oregon's family farms and the communities they serve. It would also effectively ban legal commercial and recreational trapping of wild mink, jeopardizing livelihoods and wildlife management.
- **Petitioner Relies on Hyperbole and Sensationalist Statements Rather Than Science and Facts**
Terminology such as "serious risk factor", "risks become particularly acute", "living under poorly regulated and stressful conditions" and "are prone to escaping into the wild" are sensational, agenda-driven and scientifically unsupported.
- **Mink Farms Pose Little Risk to Human or Animal Health**
Biosecurity on farms, the absence of any confirmed cases of animal to human transmission and the relatively few mink fatalities point to a situation that is manageable and low risk.

In closing, we urge the ODFW to reject the Center for Biological Diversity's petition to add mink to the Prohibited Species List. Thank you.

Respectfully,



Michael Whelan
Executive Director, Fur Commission USA

¹ "Detection of new SARS-CoV-2 variants related to mink"

<https://www.ecdc.europa.eu/sites/default/files/documents/RRA-SARS-CoV-2-in-mink-12-nov-2020.pdf>

² "Danish Covid mink variant 'very likely extinct', but controversial cull continues":

<https://www.theguardian.com/environment/2020/nov/19/danish-covid-mink-variant-very-likely-extinct-but-controversial-cull-continues>

³ "Tests at an Oregon mink farm show SARS-CoV-2 still present with no virus mutations; testing, surveillance, and trapping continues", <https://odanews.wpengine.com/tests-at-an-oregon-mink-farm-show-sars-cov-2-still-present-with-no-virus-mutations-testing-surveillance-and-trapping-continues/>: "Encouraging Results from Ongoing Investigations on Utah Mink Farms"; <https://ag.utah.gov/2020/12/28/encouraging-results-from-ongoing-investigations-on-utah-mink-farms/>

⁴ "Standard Guidelines for the Operation of Mink Farms in the United States"; <https://furcommission.com/guidelines/>

From: Michael Whelan <mw@furcommission.com>
Sent: Friday, February 12, 2021 7:19 AM
To: Michelle Tate <Michelle.L.Tate@state.or.us>
Subject: Fwd: Oregon Mink Farm Update

Good morning Michelle, dont know if its too late to pass along to the Commission,...but great news. Thanks
Michael

----- Forwarded message -----

From: Oregon Department of Agriculture <ODA@public.govdelivery.com>
Date: Thu, Feb 11, 2021 at 2:22 PM
Subject: Oregon Mink Farm Update
To: <mw@furcommission.com>

Having trouble viewing this email? [View it as a Web page.](#)

News Release: February 11, 2020

Oregon mink farm now clear of SARS-CoV-2; farm quarantine lifted

On February 11, the Oregon Department of Agriculture (ODA) lifted the quarantine on the Oregon mink farm previously affected by SARS-CoV-2. ODA placed the farm under quarantine (no animal or animal products could leave the farm) on November 24, after ten mink samples tested positive for the virus. The Oregon Health Authority also asked those working on the farm to self-isolate and provided training on enhanced Personal Protective Equipment (PPE). Health officials believed the mink contracted the virus from caretakers.

During the quarantine, ODA conducted five rounds of SARS-CoV-2 testing at the farm. The USDA National Veterinary Services Laboratories (NVSL) confirmed the last two rounds of samples, showed the virus no longer detectable among the 62 samples collected. Per USDA and Centers for Disease Control and Prevention (CDC) guidance, ODA required two consecutive rounds of negative testing for SARS-CoV-2 before lifting the farm quarantine.

"Getting to this result involved a big group of hard-working people from several agencies both state and federal, not to mention the cooperation of the farmer," said Dr. Ryan Scholz, state veterinarian, ODA. "We followed the guidance provided by USDA and CDC, the farmer cooperated throughout the entire process, the virus was not detected in nearby

wildlife, and sequencing showed that the SARS-CoV-2 virus on this farm did not mutate. This is a best-case scenario, and we are sharing what we have learned with others."

ODA is not identifying the farm's location because, in this case, the affected facility is small. Therefore, disclosing any individually identifiable information could reasonably result in disclosing an individual's medical information, precisely an individual's COVID-19 status. ODA believes that the COVID status of an identified person is considered personal information that should not be disclosed to the public and would be an unreasonable invasion of privacy under ORS 192.355(2). Therefore, ODA is declining to release this information. According to the USDA, controlling the virus in people is ultimately the best way to mitigate the virus from spreading to animals.

ODA News Blog

Contact

Andrea Cantu-Schomus

acantuschomus@oda.state.or.us

503-881-9049

Oregon Department of Agriculture

Email us: info@oda.state.or.us | Call: 503-986-4550

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Michael Whelan

Executive Director,

Fur Commission USA

541.595.8568

www.furcommission.com

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