

Exhibit G

**Supplemental Public Correspondence
Received as of March 18, 2021**

From: Ruth <rrubelt@q.com>
Sent: Wednesday, March 17, 2021 7:01 PM
To: ODFW.Commission@state.or.us
Subject: Mink

I understand that the Center for Biological Diversity has petitioned the Oregon Fish and Wildlife Commission, demanding that they ban mink farms in Oregon to stop the spread of COVID-19. I am concerned about this issue as **not only is this petition unwarranted, it's a threat to Oregon agriculture!**

As a rancher in Oregon, I ask you to deny the Petition to Add Mink to the List of Prohibited Species, as recommended by ODFW staff.

Thank you for taking time to read my comments.

Ruth Rubelt

Sent from [Mail](#) for Windows 10

From: Mary Anne Cooper <maryannecooper@oregonfb.org>
Sent: Tuesday, March 16, 2021 8:39 PM
To: ODFW Commission <ODFW.Commission@state.or.us>
Subject: Letter Re: Exhibit G - Mink Petition

Good evening,

Attached please find a comment letter on Exhibit G – the mink petition.

Thanks!

Mary Anne

Mary Anne Cooper | Vice President of Public Policy
Oregon Farm Bureau
1320 Capitol St. NE, Suite 200, Salem, OR 97301
Cell: 541.740.4062 • **Office:** 503.399.1701 x. 306 • **Fax:** 503.399.8082
maryanne@oregonfb.org • oregonfb.org

Please note that in support our members' and staff's well-being, and our obligation to public health, OFB in-office hours will vary and staff are best reached by email or cell phone. You can find the latest information we have for members at <https://oregonfb.org/covid19/>. Thank you for your patience and help during the Covid-19/coronavirus response.



OREGON
FARM
BUREAU

Locally Grown
and
GROWING STRONG

March 16, 2021

Fish and Wildlife Commission
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

RE: Petition to Add Mink to the List of Prohibited Species

Chair Wahl and Members of the Committee,

The Oregon Farm Bureau writes to ask the Commission to deny the Petition to Add Mink to the List of Prohibited Species, as recommended by ODFW staff. By way of background, the Oregon Farm Bureau is the state's largest agricultural trade association, representing nearly 7,000 farm and ranch families across the state. In addition to being some of the leading producers in the nation for a number of agricultural commodities, 97% of Oregon's farms and ranches are family owned and operated, with multiple generations of family members handling all aspects of operations and administration for the farm. Among these multigenerational farms are several mink farms who produce fur and oil for the world market. These farmers meet the highest standards of animal welfare and sustainability, and mink form an important component of the agricultural production chain in Oregon, consuming food byproducts and producing valuable fertilizer.

This Petition is based upon scare tactics and half-truths by the Center for Biological Diversity regarding the role of mink in the ongoing SARS-CoV-2 pandemic. These claims have no basis in science. They are purely an attempt to shut down long-standing family mink farms. The one farm in Oregon that had mink test positive for COVID-19 in late 2020 handled everything appropriately from a zoonotic disease, animal welfare, and animal health perspective, immediately going into quarantine and working with the state veterinarian, state and federal agencies, and others in the

industry to contain the virus and ensure that it didn't spread outside the farm. The virus was NOT found in wildlife and did not mutate. The farm that engaged in the quarantine did not pose a risk to human or animal health, as evidenced by the fact that the virus was immediately contained and the outbreak short lived. The impacted farm is now clear of the virus, and no other farms in the state have been impacted.

Instead of focusing on the appropriate response of the farmer and the state, CBD is using the outbreak as an attempt to ban "farmed" mink. Setting aside the lack of scientific basis for the request, this request is also outside the jurisdiction of the Oregon Department of Fish and Wildlife and this Commission. The Oregon Department of Agriculture is the only agency with the authority to regulate infectious diseases that affect livestock, and mink are considered livestock under Oregon law. The Commission lacks the legal authority to adopt the Petition. As such, the Oregon Farm Bureau agrees with the staff recommendation, and urges this Commission to deny the petition as outside ODFW's statutory authority.

Our family farms have been particularly hard hit by the global pandemic, as markets have shifted overnight. It is inappropriate for a group to use the pandemic to shut down family fur farms in Oregon. Thank you for your consideration and please let me know if you have any questions.

Sincerely,



Mary Anne Cooper,
Vice President of Public Policy
Oregon Farm Bureau

From: Jenny Dresler <jenny@pacounsel.org>
Sent: Tuesday, March 16, 2021 7:42 PM
To: odfw.commission@state.or.us
Cc: mw@furcommission.com
Subject: Materials for March 19 Commission meeting

Please find attached materials for the Fish and Wildlife Commission meeting for Agenda Item G from the Fur Commission USA.

Thank you,

Jenny Dresler
On behalf of Fur Commission USA



Jenny Dresler
Director of Grassroots

phone: 503-363-7084
mobile: 503-810-4174
email: jenny@pacounsel.org
991 Liberty St SE
Salem, OR 97302





FUR COMMISSION USA

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Fur Commission USA (FCUSA) Fact Sheet on Coronavirus Cases on US Mink Farms (March 1, 2021)

What is the current prevalence of SARS-CoV-2 on US Mink Farms?

On August 17, 2020, the USDA announced the first confirmed cases of SARS-CoV-2 at mink farms in Utah. Over the following few months, a total of 16 farms in Utah, Oregon, Wisconsin and Michigan had confirmed positive cases. In each case, illness among the farm workers occurred previous to the animals being infected. There is no evidence that the mink infected the workers.

Farms with positive cases were put under quarantine with no animals and no animal products entering or leaving the farms. All U.S. farms are abiding by the *CDC One Health* protocols, the *USDA Response & Containment Guidelines for Animal Health and Public Health Officials Managing Farmed Mink and other Farmed Mustelids with SARS-CoV-2*, and State Health Department and the National Veterinary Service Lab's recommendations. Additionally, it has long been the practice of US mink breeders to adhere to strict biosecurity protocols, as mink are highly vulnerable to many human and wildlife-borne diseases.

As of March 1, testing by authorities have now detected no live SARS-CoV-2 virus in mink on 13 of those farms, with the remaining 3 in Utah awaiting results from the most recent rounds of testing. Two consecutive rounds of negative tests are required to lift the farm quarantines. Quarantines are now being lifted in Michigan, Wisconsin, Oregon, and on 9 farms in Utah.

How Does This Compare to the Summer Outbreaks in Europe?

Unlike in the US, European farms are highly concentrated and near population centers – many of which have experienced significant COVID outbreaks. Additionally, European farms maintain larger numbers of animals per farm.

In the most extreme reaction, the Danish government called for the culling of all mink in the country. After many of the mink had already been destroyed – perhaps needlessly – the government suspended the directive over the legality of such a move, and in the face of scientific evidence demonstrating a minimal risk to human and animal populations which can be managed effectively on the farm. The Minister of Agriculture was forced to resign over the premature reaction and culling strategy.

The U.S. mink industry is far different and cannot be compared to the Danish mink industry. Denmark produces almost 10 times the mink than in the US, in a land area about 1/3 the size of Wisconsin. Within that small area there are over 5 million people and 1200 mink farms. Compare this to the US which has approximately 120 farms spread out in rural areas across 16 northern states. Even in the largest domestic producing state, Wisconsin, production is spread among 19 farms all of which are isolated in outlying rural areas.

Do US farmed mink populations pose a public health threat?

It has been determined that mink contract the virus from infected humans. There have been no cases where mink are suspected to have passed the virus to humans in the US. No viral mutations have been detected in any U.S. mink. The CDC, the USDA, the National Veterinary Services Laboratory, State Animal Health Organizations and other governmental agencies and state veterinarians, are assuring us that with proper biosecurity protocols at the farm level, there is no threat to humans from mink.

Are COVID infected farms a threat to wildlife?

In December, one mink in Utah and two in Oregon, trapped outside affected farms tested positive for low levels of the virus. Twenty-five animals from nine other species have also been trapped and tested, each with negative results. There is no indication of SARS-CoV-2 or any viral mutations spreading from farmed mink into any other wildlife species.

Is there a mink vaccine available?

Zoetis, the nation's largest producer of animal vaccines, has finished clinical testing and is awaiting USDA approval to produce and distribute a vaccine for mink. We expect to have 2 million doses available by June 1. Another company, Medgene will also be producing a vaccine, expected ready for distribution by July. Vaccines have also been developed in Russia and at the University of Finland. The scientific data being collected on mink is helping with the development of vaccines that will also protect domestic cats and dogs.

Can I contract COVID from a mink coat or pelt?

No. The source of potential SARS-CoV-2 transmission is limited to contact on the farms. Research conducted by Helsinki University states that the virus, needing a live host, is eradicated long before the pelts would reach wholesale markets or consumers.

The FCUSA is the National Trade Association representing the Mink Producers of the United States. We are committed to ensuring the health of our animals and the people who come in contact with them. We continue to work closely with state, local, international and federal government agencies to take all necessary precautions to prevent the spread of the disease, protect our workers and the general population, and to develop a vaccine.

For more information on the current status of the outbreaks in the US, contact;

Dr. Ryan Scholz DVM, Oregon Department of Agriculture at (503) 580-4986

Dr. Dean Taylor DVM, Utah Department of Agriculture at (801) 982-2235, or

Kevin Hoffman, Wisconsin Department of Agriculture, Trade and Consumer Protection at (608) 224-5005.



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Mink Farming in the U.S.

Economics

- Approximately 3 million mink are commercially produced in 22 US states. In 2019, mink farming created over \$85 million in taxable revenue in the U.S and supported thousands of jobs in our rural communities. U.S. mink farms are 100% family owned and operated businesses, often with 3 generations working on the farm.

Animal Care & Welfare

- Animal health and welfare is the first priority of American mink farmers. Mink farmers have strict operating guidelines governing the humane care of animals. Farmers follow comprehensive animal husbandry practices developed with scientists, veterinarians, and welfare experts, with rigorous standards for nutrition, housing, biosecurity, veterinary care and humane harvesting. The mink farming standards in the U.S. have been certified by the Professional Animal Auditors Certification Organization (PAACO) and farms are independently inspected by Validus Verification Services.
- Like in all animal agriculture, mink farmers are subject to state and federal laws. Mink on U.S. farms are harvested according to humane practices and methods as recommended by the AVMA. Mink farms must also abide by all environmental regulations. Less than ¼ of 1 percent of all animals harvested in agriculture are taken for fur products.

Sustainability

- Farmed mink consume food industry by-products not fit for human consumption, keeping it out of our landfills. Each animal will consume more than 20-times their body weight per year of human food production by-product, translating to over 300 million pounds of waste recycled. After harvesting, mink remains are used in organic composts, artisanal pet foods and rendered into oils for conditioners, cosmetic products, and even tire-care products. Mink manure is an extremely effective crop fertilizer, rich in nutrients and in high demand. In Canada the manure has been used as biomass for electricity.
- Fur garments can last for generations. When discarded, they naturally decompose. Chemically produced synthetics are petroleum-based fabrics, and while only lasting a year or two as a garment, will remain in landfills for hundreds of years. Synthetic fabrics are a leading cause of micro-fiber pollutants that are devastating ocean and marine ecosystems.

Biosecurity

- Mink farmers have long known that mink are susceptible to various wildlife-borne and human-borne diseases, and have developed and instituted robust Biosecurity protocols to protect the animals. These protocols have been strengthened since the pandemic, using recommendations from the CDC, the National Veterinary Diagnostics Lab and the USDA.

COVID & Mink

- As of March 1, 2021, no mink have tested positive on any US farm since early February. Quarantines are lifted on 13 of the 16 U.S. mink farms that suffered a COVID outbreak. No other species of wildlife trapped in proximity to farms have tested positive. 2 million doses of a vaccine for mink will be available in June 2021.

From: John Zielinski <john@ezorchards.com>
Sent: Tuesday, March 16, 2021 6:49 PM
To: ODFW.Commission@state.or.us
Subject: mink petition

As a farmer in Oregon, I ask you to deny the Petition to Add Mink to the List of Prohibited Species, as recommended by ODFW staff.

The Center for Biological Diversity is using scare tactics and half-truths, rooted in the SARS-CoV-2 pandemic, that have no basis in science in an attempt to shut down local mink farms.

The one farm with positive COVID-19 cases in November 2020, went into quarantine immediately and worked with the State Veterinarian and federal and state agencies to contain the virus. The virus was NOT found in wildlife, as the petition suggests, and the virus did not mutate. The farm is now clear of the virus, and we should consider this a success story as opposed to misrepresenting this incident as a statewide threat.

Also, the Dept. of Agriculture clarified last month that there are no known COVID-19 outbreaks on Oregon mink farms. There is no “problem” that this petition will solve, except that certain groups want to ban mink farming.

I am concerned that the petition asks ODFW to ban “farmed” mink, which is outside the agency’s jurisdiction. Only the Oregon Department of Agriculture has the authority to regulate infectious diseases that affect livestock, and mink are considered livestock under Oregon law. This petition seems misdirected.

It is troubling to see special interest groups use the petition process to try to shut down farms, particularly after such a devastating year, and to play on people’s fear about COVID-19. I worry that this is the beginning of a new approach by some of these groups to shut down family farms across Oregon.

ODFW staff rightly recommended denial because the petition falls outside of ODFW’s statutory authority. I ask you to please deny the petition at the March 19th Commission meeting.

Thank you for considering my comments,

John Zielinski

5270 55th Ave NE

Salem OR 97305

From: Janice Flegel <janice.flegel@gmail.com>
Sent: Tuesday, March 16, 2021 6:36 PM
To: ODFW.Commission@state.or.us
Subject: Center for Biological Diversity Petition

ODFW Commissioners,

As an Oregon farmer I ask you to **deny** the Petition to Add Mink to the List of Prohibited Species, as recommended by ODFW Staff.

It is troubling to see special interest groups using the petition process trying to shut down a farming industry. I worry that this is the beginning of a new approach by some of these groups to shut down family farms across Oregon.

ODFW staff rightly recommended denial because the petition falls outside of ODFW's statutory authority. I ask you to please deny the petition at the March 19th Commission meeting.

Thank you for considering my comments,

Janice Flegel