UTAH ANIMAL RIGHTS COALITION

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Tom Vilsack, Nominee for Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Sent via e-mail: secretary@usda.gov

Dear Mr. Vilsack:

I write as a public health advocate and on behalf of Utah Animal Rights Coalition (UARC) and our more tens of thousands of members and supporters to ask that the U.S. Department of Agriculture (USDA) under your leadership take a more proactive role in addressing the significant threat posed by mink farms in contributing to the COVID-19 pandemic. Specifically, we urge you to invoke the authority granted to the USDA's Animal and Plant Health Inspection Service (APHIS) under the Animal Health Protection Act, 7 U.S.C. § 8301, to order an immediate closure of all mink farms in the United States. Swift action is necessary to effectively combat the COVID-19 pandemic, prevent the loss of human life, and the spread of the disease to wild animal populations. In response to this recognized public health threat, similar measures are already being undertaken by authorities in several European nations which previously had large mink farming industries. We also ask that the USDA foster greater transparency with the public about how the federal government has managed its response to this crisis in conjunction with the mink farming industry.

As you may be aware, at least sixteen mink farms in the United States are have experienced outbreaks of SARS-CoV-2, the virus that causes COVID-19. Twelve of these farms are located in Utah, which is one of the top two fur-producing states in the United States. The other mink farms with confirmed cases are located in Oregon, Wisconsin, and Michigan. This situation is alarming to infectious disease experts because SARS-CoV-2 is able to be transmitted from humans to mink, between mink themselves, and then even from mink to humans. This type of zoonotic transmission, known as bidirectional transmission, is particularly dangerous, because it allows mutated "variant" strains of the virus that arose in mink to then be transmitted to humans. There are three significant concerns with variant SARS-CoV-2 strains being transmitted and circulated among humans: (1) a variant strain could be more transmissible, (2) a variant strain could cause greater mortality or morbidity, or (3) a variant strain could exhibit an "antibody escape" mutation, evading the vaccines currently being distributed throughout the country.

These real and significant concerns have understandably led many European nations with large mink farming industries to implement strict interventions:

- **The Netherlands:** Dutch authorities ordered all mink farms to be permanently closed in March 2021, before the new breeding period, in order "to prevent the establishment of a permanent reservoir in mink industry and a greater risk to public health."[1]
- **Denmark:** Danish authorities detected that a mink-associated variant of SARS-CoV-2 was circulating in the human population, and that this new variant was associated with an increased incidence of COVID-19. Approximately 20% of all mink farms in Denmark reported COVID-19 outbreaks. On November 4, 2020, Danish authorities ordered all mink culled and the mink industry shuttered until at least December 31, 2021.[2]
- **Ireland:** Irish authorities, including top infectious disease expert Tony Holohan, ordered the culling of all 120,000 mink on Ireland farms to be culled, "signaling a likely end to Irish fur farming."[3]

In the United States, however, it does not appear that any meaningful interventions have been taken aside from implementing quarantines of farms with active COVID-19 outbreaks that affect only the movement of animals and goods between farms. While mink farms in the United States are currently mostly empty because of the end of "pelting season," mink farms are still being allowed to breed to full capacity like normal in March, at the beginning of "breeding season." This is shockingly reckless. Right now, we have window of opportunity to close these farms before they are populated with immunologically naïve animals who will act as a reservoir for the virus that causes COVID-19.

Our inaction has already had serious consequences. Under the prior administration, several workers on mink farms became infected and at least one manager died from COVID-19 at a Utah mink farm. Additionally, two states (Oregon and Utah) have now trapped wild animals in the "immediate vicinity" of mink farms who have tested positive for COVID-19,

Additionally, it does not appear that any systemic genomic surveillance is occurring on U.S. mink farms, aside from sporadic PCR testing. Whole genome sequencing – not PCR tests – are necessary in order to detect variants of the virus that may be

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[1] do Vale B, *et al*. Bats, pangolins, minks and other animals - villains or victims of SARS-CoV-2?. *Vet Res Commun*. 2021;45(1):1-19. doi:10.1007/s11259-021-09787-2. Available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7813668/.

[2] World Health Organization. SARS-CoV-2 mink-associated variant strain – Denmark. 3 Dec 2020. Available at https://www.who.int/csr/don/03-december-2020-mink-associated-sars-cov2-denmark/en/.

[3] Pogatchnik, Shawn. Ireland signals likely end to fur farming with cull of 120,000 mink. *Politico.* 19 Nov 2020. Available at https://www.politico.eu/article/ireland-signals-likely-end-to-fur-farming-with-cull-of-120000-mink/.

arising on U.S. mink farms. *Post hoc* PCR tests are simply inadequate. This lack of robust genomic surveillance is consistent with this nation's "sparse" genomic surveillance programs for the past year.[4] Threats could very well be emerging on these farms and we wouldn't even be equipped with the knowledge of that threat. This is inexcusable. We hope this begins to change with the change of federal leadership.

Finally, the lack of transparency from federal and state authorities is troubling and must be rectified. The public still has not been apprised on the nature of the USDA & the CDC's surveillance and response to COVID-19 on U.S. mink farms, nor the nature of the compensation from public funds that some mink farmers have reportedly been receiving. In response to a FOIA I submitted in August, the USDA has only provided a small fraction of responsive material. State veterinarians at local and state agencies have repeatedly issued false or misleading statements that the virus that causes COVID-19 cannot spread from mink to humans, when in fact such transmission has been positively identified by European researchers repeatedly. Most disturbingly, state authorities in Utah failed to disclose that at least one human being died at a mink farm, and have repeatedly and falsely stated that transmission of the virus to wild animals had not occurred. It's time for a full and frank accounting of this public health crisis with the American people, not spin to protect the financial well-being of this one politically well-connected industry.

I am hopeful that with the change of federal leadership we will soon see a change in approach to this significant public health threat. I urge you to invoke your existing statutory authority to order the immediate closure of all mink farms in the United States, and to begin the process of meaningful accountability and transparency by releasing additional documents about the USDA's response to this crisis. I look forward to hearing from you.

Sincerely,



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[4] https://www.theatlantic.com/health/archive/2021/01/coronavirus-mutations-variants/617694/