



November 6, 2020

VIA ELECTRONIC MAIL

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Dear Oregon Department of Agriculture and Oregon Health Authority officials,

On behalf of the Center for Biological Diversity (Center) and our over 30,197 members and supporters in Oregon, we write to ask you to immediately conduct an investigation into COVID-19 outbreaks and potential zoonotic transmission at Oregon's 11 permitted mink confined animal feeding operations, as well as any other mink operations in the state. With reports of significant outbreaks amongst mink in the United States, and even more alarming, an outbreak of a mutant COVID-19 strain spreading from mink to humans in Denmark, we urge your prompt attention to this urgent public health threat.

The Center is a non-profit environmental organization that for thirty years has been dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center's Environmental Health Program aims to ensure that all species, humans included, are safe from dangerous pollution from an array of sources, including from industrial animal farming operations. Our Oregon-based office is located in Portland.

Earlier this week, Denmark announced that it will be killing all 15 million of the mink raised in the nation following confirmation from the Danish Health Minister that 12 people had been infected with a mutated strain of COVID-19 that was spreading from mink to humans.¹ The main reason that Denmark, which is the largest producer of mink skin and fur in the world, decided to take this drastic action was simple: the mutated strain could undermine the efficacy of a COVID-19 vaccine or even pose its own novel risks. About half of northern Denmark's 783 human COVID-19 cases are related to mink farming.

While there have, thankfully, been no confirmed cases of mutated COVID-19 in the United States, COVID-19 has hit mink production facilities in the United States as well. Since August, the U.S. Department of Agriculture has announced confirmed cases of COVID-19 in mink at nine Utah mink farms,² leading to an estimated 10,000 mink deaths.³ In addition, at least 3,400 mink have died over the last month after contracting COVID-19 in Wisconsin.⁴

The risk of the same happening in Oregon is not merely theoretical, and the time to open a public investigation into COVID-19 at Oregon's mink operations is now. Indeed, as early as September, the Center for Infectious Disease Research and Policy at the University of Minnesota published a report on the emerging research about the zoonotic transmission of COVID-19 among human and nonhuman animals, and found that "new studies suggest that high proportions of cats and dogs may have acquired COVID-19 from their owners and that the virus jumped back and forth between humans and minks on farms in the Netherlands."⁵ Specifically, a study of infections at 16 mink farms in the Netherlands determined that the virus could be spread bidirectionally between mink and humans. Ultimately, the researchers that conducted the study "conclude[d] that initially the virus was introduced from humans and has evolved on mink farms, most likely reflecting widespread circulation among mink in the first SARS-CoV-2 mink farms, several weeks prior to detection." SARS-CoV-2 is the virus that causes COVID-19.

¹ Associated Press, *Denmark Wants to Cull 15 Million Minks Over COVID-19 Fears*, AP News (Nov. 4, 2020), available at <https://apnews.com/article/denmark-cull-15-million-minks-covid-19-37f57a303bbf738efca50918c35696de>.

² U.S. Dep't of Agric., *Confirmed Cases of SARS-CoV-2 in Animals in the United States* (Oct. 14, 2020), available at https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/sa_one_health/sars-cov-2-animals-us.

³ Wilson Wong, *Nearly 10,000 Minks Die After Covid-19 Outbreak at Utah Fur Farms*, NBC News (Oct. 9, 2020), available at <https://www.nbcnews.com/news/us-news/thousands-minks-die-covid-19-utah-farms-n1242754>.

⁴ Hope Kirwan, *More than 3K Mink Reported Dead at WI Mink Farm from COVID*, Wisconsin State Farmer (Nov. 5, 2020), available at <https://www.wisfarmer.com/story/news/2020/11/05/more-than-3-k-mink-reported-dead-wi-mink-farm-covid/6174646002/>.

⁵ Mary Van Beusekom, *COVID-19 Likely Spreading from People to Animals-And Vice Versa*, CIDRAP News (Sept. 18, 2020), available at <https://www.cidrap.umn.edu/news-perspective/2020/09/covid-19-likely-spreading-people-animals-and-vice-versa>; see also Oude Munnink BB, *et al.* (2020), *Jumping back and forth: anthroozoonotic and zoonotic transmission of SARS-CoV-2 on mink farms*, *bioRxiv*, doi: <https://doi.org/10.1101/2020.09.01.277152>, available at <https://www.biorxiv.org/content/10.1101/2020.09.01.277152v1>.

While this industry operates in secrecy, based on the best information available to us, there are 11 permitted confined animal feeding operations raising furbearing animals in Oregon. Based on a recent presentation by the Oregon Department of Agriculture, we believe all 11 of these permitted operations are mink-rearing facilities.⁶ These facilities house approximately 438,327 animals. In addition, there are an unknown number of smaller facilities raising mink in the state. We do not wish to spread alarm; however, we are deeply concerned that these facilities could, knowingly or unknowingly, be contributing to the spread of COVID-19 in the state, or could even house or come to house new mutations of COVID-19, like the one discovered in Denmark.

We therefore strongly request that you immediately send inspectors to all mink-rearing facilities, starting with the ones containing the largest concentration of animals, to conduct an investigation and ensure that these facilities do not imperil public health. We further request that you promote public health and safety through transparency by making information about any cases of COVID-19 transmission on Oregon mink farms immediately available to the public.

In addition, if a public health threat is discovered and the animals must be killed, concerted attention must be focused on safe carcass disposal. Disposal of animal carcasses via unlined burial or on-site incineration can both pose additional public health threats.⁷

Thank you for your attention to this matter,



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⁶ See presentation by Wym Matthews at Clackamas Community College on the Oregon Department of Agriculture CAFO Program, at 11, available at https://www.clackamas.edu/docs/default-source/degrees-certificates/departments-programs/wet-orwef---stormwater---or-dept-of-ag-cafo-program.pdf?sfvrsn=8fb68d68_0.

⁷ See, e.g., Marchant-Forde JN and Boyle LA (2020), COVID-19 Effects on Livestock Production: A One Welfare Issue, *Front. Vet. Sci.* 7:585787, doi: 10.3389/fvets.2020.585787, available at <https://www.frontiersin.org/articles/10.3389/fvets.2020.585787/full>; Center for Biological Diversity, Emergency Petition for Rulemaking on Farm Animal Carcass Management During Animal Health Emergencies (2020), available at https://www.biologicaldiversity.org/programs/environmental_health/pdfs/2020-06-28-APHIS-Petition.pdf.