

## **COMMENTS IN FAVOR OF HOUSE BILL 3204: RELATING TO ZOO NOTIC DISEASES**

Animal Wellness Action, the Center for a Humane Economy and Animal Wellness Action, three nonprofit organizations with supporters and staff members that reside in the state of Oregon, hereby submit these comments in favor of House Bill 3204, which directs the state agencies to work together to prepare a report concerning Oregon’s current framework for preventing, monitoring and responding to zoonotic diseases and directs the State Fish and Wildlife Commission to establish and periodically update list of wildlife species and other scientifically recognized categories of wildlife that may not be imported, possessed, sold, purchased, exchanged or transported in this state due to potential for transmission of zoonotic disease. HB 3204 is commonsense legislation that is critical in helping to prepare for the inevitable pandemics that will continue to plague the nation and the state of Oregon in the coming years.

The onset of the zoonotic diseases lies in the all-too-present intersection between inhumane treatment of certain species and the transmission to humans.<sup>1</sup> We are now experiencing the latest fallout from our reckless and irresponsible practices concerning our meat sources and misuse of both domestic and wild animals where a virus spawned by the inhumane treatment of animals in China at the end of 2019 may now be spread by ongoing mistreatment of animals here in our own nation.

As several researchers have documented, mink are highly susceptible to COVID-19, more than any other non-human animal.<sup>2</sup> The packed conditions, and the unyielding stress that the animals endure, almost certainly weakens their immune response and enhances the likelihood of infections. Mink are wild, semi-aquatic animals that typically roam and hunt over land areas as large as 2,500 acres.<sup>3</sup> The unnatural, barren, caged conditions that mink are subjected to on these facilities greatly increases their susceptibility to the virus as their stress levels rise and abnormal behavior such as pacing, swaying, self-mutilation, cannibalism and infanticide occurs.<sup>4</sup>

This unique susceptibility is having devastating impacts across the United States and in Europe; several states throughout the U.S. – including Oregon, Utah, Wisconsin, and Michigan – have experienced tens of thousands of COVID-19 infections and deaths among captive mink populations. Several European nations have conducted mass euthanasia programs to arrest the spread of the virus, and they are fairly compensating the producers for losses and for the permanent shutdown of their operations.

---

<sup>1</sup> <https://onlinelibrary.wiley.com/doi/full/10.1002/wmh3.348>

<sup>2</sup> *Id.*

<sup>3</sup> [https://www.furfreealliance.com/wp-content/uploads/2017/09/Factsheet\\_Animal-welfare-problems-in-fur-farming.pdf](https://www.furfreealliance.com/wp-content/uploads/2017/09/Factsheet_Animal-welfare-problems-in-fur-farming.pdf)

<sup>4</sup> *Id.*

There is now evidence from studies in Denmark and the Netherlands that not only is the virus capable of being transmitted from mink to human, but it may do so in a mutated form. The acute concern is that the mutation will allow the virus to resist newly developed vaccines now being administered under Emergency Use Authorization or those in development – a circumstance that has the potential to upend vaccine development and administration. The World Health Organization has called the mutation concerning and has called for further studies to ascertain the impact on vaccines currently in development. The “cluster-5” mutation found in Denmark has a combination of mutations that had not previously been observed. Early findings indicate that this mutation decreased sensitivity to neutralizing antibodies in humans.<sup>5</sup>

The World Organization for Animal Health (OIE) has issued guidance that describes the truly shocking facts about farmed mink and transmission of COVID-19:<sup>6</sup>

- The risk is high for human to animal transmission, moderate for animal to human transmission, and very high for transmission between animals.
- The risk of SARS-CoV-2 transmission from infected farmed minks to humans in contact with the mink is high.
- The risk of SARS-CoV-2 transmission between farmed and domestic animals on infected mink farms is high for cats and dogs.
- The risk of SARS-CoV-2 transmission between farms through movement of live infected mink is high.
- The risk of transmission of SARS-CoV-2 between different mink farms through infected humans is considered high.
- The risk of transmission of SARSCoV-2 through import/export of carcasses or products from infected animals of the susceptible species listed above is considered low to medium.

An outbreak on large farms may take several months before the virus fades out. Events in the Netherlands and Denmark show ongoing new outbreaks caused by mink associated variants of SARS-CoV2, pointing at ongoing transmission between farms and transmission from mink to humans.<sup>7</sup> A study in the Netherlands states that by the end of June 2020, 68 percent of mink farm workers and their family members had tested positive for the virus or had antibodies to SARS-CoV-2. These large clusters of infection were initiated by human COVID-19 cases and have

---

<sup>5</sup> <https://www.who.int/csr/don/06-november-2020-mink-associated-sars-cov2-denmark/en/>

<sup>6</sup> [https://www.oie.int/fileadmin/Home/MM/Draft\\_OIE\\_Guidance\\_farmed\\_animals\\_cleanMS05.11.pdf](https://www.oie.int/fileadmin/Home/MM/Draft_OIE_Guidance_farmed_animals_cleanMS05.11.pdf)

<sup>7</sup> Bas B. Oude Munnink et al, Transmission of SARS-CoV-2 on mink farms between humans and mink and back to humans, Science 08 Jan 2021: Vol. 371, Issue 6525, pp. 172-177, DOI: 10.1126/science.abe5901

subsequently shown that mink-to-human transmission occurred.<sup>8</sup> In late January 2021, Sweden reported on the death of a mink worker there.

These studies confirm that there is a risk of establishing a reservoir of SARS-CoV-2 due to ongoing transmission between farms.<sup>9</sup> In Oregon, mink recently escaped from a quarantined mink farm and were later trapped and tested positive for SARS-CoV-2.<sup>10</sup> While self-interested industry participants downplay the frequency of farmed mink escaping into the wild, a 2013 study concluded that 18% of free-ranging mink in Ontario, Canada were either escaped domestic animals or hybrids.<sup>11</sup> On the run, infected mink can come into contact with an indeterminate number of other animals of multiple species, contributing to the risk of a SARS-CoV-2 reservoir in wildlife, that could then be transmitted back to people, perhaps in a mutated form.

COVID-19 has had a devastating effect on Oregon's economy with over the past year, with over 90 percent of businesses reporting negative impacts and 70 percent of businesses reporting a decline in revenue.<sup>12</sup> Twenty percent of the state's labor force collected unemployment benefits in 2020, totaling \$6.5 billion.<sup>13</sup> While the final financial impact of COVID is yet to be known, state economists are predicting a \$4.4 billion budget shortfall in 2021-23 and \$3.3 billion in the following years.<sup>14</sup>

Contrast those numbers with the economic benefits of a dwindling industry that exists to provide fur for a select luxury fashion industry, with pelts being shipped mainly to China as demand for fur has dropped significantly in the United States over the past decade. Because of the dropping demand, mink pelts are becoming a decreasingly priced commodity, with pelt prices sinking by 80% over the past ten years, down to a 2019 low of just under \$22.

The Oregon mink farming industry consists of a dozen facilities that produced approximately 202,000 mink pelts in 2019. The production and price of pelts put the Oregon mink industry at a value of \$4.44 million, a tiny fraction of the state's \$223.38 billion GDP. While the exact number of people employed in the mink farm industry is unknown, farms generally employ a small handful of workers. It is likely that all of Oregon's operations employ around 50-60 people.

Yet, even with the public health and economic benefits of shutting down the mink industry being so clearly evident, these potential disease vectors continue to operate in the state. Should a mink farm contribute to a new wave of infections – with infected workers bringing the

---

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> Two Escaped Farm Mink Test Positive for COVID-19 During Mink Trapping Season, Willamette Week, Jan 14, 2021

<sup>11</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3728966/>

<sup>12</sup> <https://sos.oregon.gov/blue-book/Pages/facts/economy-overview.aspx>

<sup>13</sup> *Id.*

<sup>14</sup> <https://www.opb.org/news/article/oregon-budget-coronavirus-covid-19-economic-impact/>

virus back into their communities – government leaders in Oregon may order future lockdowns of businesses, extending the lifespan of the extraordinary social and business dislocations of the past year and adding to the economic losses suffered in the state.

It is no small irony that Oregon and the rest of the United States would assume enhanced domestic economic risks when it comes to the spread of COVID to supply a luxury product to China. It was China that recklessly tolerated open-air, live-wildlife markets and launched the virus around the world even after animal welfare advocates and scientists warned that a virus might jump the species barrier. Now we are incubating the virus on factory mink farms to clothe some small percentage of its citizens in fur. China might welcome this self-destructive act by the United States, but Oregon shouldn't play along.

The science around the current pandemic is evolving, as new variants emerge, vectors identified and vaccines discovered. And while the current COVID crisis may hopefully be met with the rapid development of several promising vaccines, zoonotic disease experts all tell us that it's not a matter of if, but when, the next pandemic will strike. As one virologist states, "There will be more pandemics, and there is a feeling among scientists that [COVID-19] could just be a dress rehearsal for the real big pandemic."<sup>15</sup>

The rise of COVID-19 from wet markets in China, and the spread to mink farms in the United States, where these operations continue to exist with little-to-no government oversight and any adequate, protective response, presents lessons that we fail to learn at our own peril. Reliance by states on a federal response to future pandemics is ill-advised. Our federal government failed miserably to protect the people of the United States, including Oregonians, from the horrific public health and economic costs of the COVID pandemic. HB 3204 is a step towards ensuring that our past mistakes are not repeated, allowing Oregon to implement informed polices and make smart decisions in preparation for the future.

Given the potential, dire impacts of the coming zoonotic pandemics that await us, our children, and their children, there is simply no good reason not to support the passage of HB 3204.

Sincerely,



Scott Edwards  
General Counsel  
Animal Welfare Action  
Center for a Humane Economy

---

<sup>15</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3728966/>