

November 16, 2020

**Sent via email**

Robert R. Redfield, M.D.  
Centers for Disease Control and Prevention  
1600 Clifton Rd.  
Atlanta, GA 30329-4027

Dear Dr. Redfield,

On behalf of Animal Wellness Action, the Animal Wellness Foundation, the Center for a Humane Economy, SPCA International, the Michelson Center for Public Policy, and the Center for Responsible Science we ask for your intervention to address the potential spread of COVID-19 by U.S.-based mink farms. Mink farms have the potential to become virus super-spreaders, and we urge you to focus the kind of attention that European public health authorities are directing at their mink farms across that continent.

Several states throughout the U.S. – including Michigan, Oregon, Utah, and Wisconsin -- are now experiencing tens of thousands of COVID-19 infections and consequent deaths among captive mink populations. Several European nations have resorted to mass killing of mink as a hedge against the spread of the virus, and governments are compensating producers for losses and even in some cases for the permanent shutdown of their operations.

There is now evidence from studies in Denmark that not only is the virus capable of being transmitted from mink to humans, but it may do so in a mutated form that has the potential to make vaccine development even more challenging. The World Health Organization (WHO) has called the mutation concerning and has called for further studies to determine the impact on vaccine development. The “cluster-5” mutation has a combination of viral reorganizations that had not previously been observed. Early findings indicate that this mutation decreased sensitivity to neutralizing antibodies in humans.<sup>1</sup>

Prior to the mink outbreak in Denmark, the U. S. Department of Agriculture (USDA) and Centers for Disease Control (CDC) and state animal and public health partners issued non-binding guidance for farmed mink and COVID-19 under the One Health Approach.<sup>2</sup> This guidance does not contemplate the potential risk of mutation that could lower neutralizing antibodies in humans. While the guidance suggests steps to slow the transmission, there is no indication that these steps are being implemented or enforced.

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<sup>1</sup> <https://www.who.int/csr/don/06-november-2020-mink-associated-sars-cov2-denmark/en/>

<sup>2</sup> [https://www.aphis.usda.gov/animal\\_health/one\\_health/downloads/sars-cov-2-guidance-for-farmed-mink.pdf](https://www.aphis.usda.gov/animal_health/one_health/downloads/sars-cov-2-guidance-for-farmed-mink.pdf)

The World Organization for Animal Health (OIE) recently issued similar non-binding draft guidance. The OIE guidance lays out alarming details farmed mink and transmission of COVID-19.<sup>3</sup>

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

France and the Netherlands have made the decision to shut down all of their mink farms, recognizing that the risks exceed the dwindling economic rewards of a receding industry. The largest mink producer in the world, Denmark initially announced that it will kill all 17 million mink at more than 1,000 farms, but may be retreating because of industry pressure.

This is a minor and declining industry in the U.S., with a sharp decline in mink production because of widespread fashion industry rejection of mink. In 2011, US mink pelt values averaged \$94.30 and the industry generated over \$290 million income. By 2019, those values have reached a decades-long low, with average pelt prices down to \$21.90 and industry revenues, at less than \$60 million, only a fifth of what they were just a decade earlier. (Mink, July 2020, National Agriculture Statistics Center, ISSN: 1949-1549)

Most U.S.-produced mink fur is sold to China. And it is no small irony that the United States would assume enhanced domestic 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 we shouldn't play along.

The federal government has largely been silent on this matter, and this inattention has the potential to spread COVID-19 and shut down large portions of our economy for a relatively inconsequential industry when it comes to GDP.

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<sup>3</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)

It is also relevant, of course, that the commodity can readily be substituted for with human-made or natural fibers. Other U.S. manufacturers will take up the slack if U.S. fur production diminishes, creating jobs and commercial enterprises to replace it.

To counter the ongoing threat that mink farms pose to our communities, we ask that you take the following steps:

**1. An immediate quarantine of all mink farm operations in the country.**

Mink farms should be taken out of the stream of commerce as these rampant infection rates continue. There should be no movement of non-essential products or workers to and from mink farms, including the movement of live animals on and off the farms or animal furs destined for the marketplace.

These facilities are more prone to COVID-19 outbreaks than any other agricultural operations because of the unique susceptibility of the mink to the virus. A number of studies have documented incidents of interspecies transmission of COVID-19 from infected animals to other animals and humans.<sup>4</sup> The virus now appears to have found a way to mutate in mink and become transmissible back to humans, but in a form that could be resistant to vaccines.

**2. A halt to breeding programs to arrest the expansion of host animals.**

Shrinking numbers of mink is one essential strategy of containment. We ask that you immediately order mink operations to cease with any onsite breeding programs that introduce more potential diseased animals into the captive mink farm system.

The onset of the COVID-19 virus lies in the all-too-present intersection between inhumane treatment of certain species and the transmission to humans.<sup>5</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>6</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>7</sup>

**3. Coordination with USDA officials to implement a longer-term solution.**

We have called on the USDA to implement a program that includes a buyout to phase out mink farms. A buy-out is the humane thing to do for the producers, and it is the right economic and

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<sup>4</sup> <https://www.forbes.com/sites/williamhaseltine/2020/06/23/covid-19-ping-pong-animal-to-human-human-to-animal-animal-to-human-transmission-how-great-a-danger/#72aa003222f4>

<sup>5</sup> <https://onlinelibrary.wiley.com/doi/full/10.1002/wmh3.348>

<sup>6</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>7</sup> Id.

public health decision for the country. We ask that you reach out to USDA and discuss the merits of a buyout of the remaining mink farms.

The recent announcement of a potentially effective vaccine on the horizon to protect people from COVID-19 is certainly welcome news. Yet with the United States now recording record numbers of COVID-19 cases and the death toll quickly nearing a quarter of a million Americans, we know that more immediate steps are needed to address this ongoing crisis as a vaccine undergoes further testing, approval and manufacturing. That is why we are heartened to hear that President-elect Biden's priority is to rapidly assemble a task force to cure the nation of this devastating virus. One of our first steps should be to put an end to nonessential activities that present a high risk of spreading COVID-19 into our ailing communities – like mink farming. These farms are barely viable now, and it is the right time for economic assistance from the federal government to exit the business on sound financial footing.

We are happy to discuss this issue with your office and provide more information as needed.

Sincerely,



Deborah Wilson, M.D.  
*Board Chair, Animal Wellness Action*



Gary K. Michelson, M.D.  
*Founder & Co-chair, Michelson Center for Public Policy*



Gerry R. Boss, M.D.  
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