

October 9, 2024

Senate Standing Committee on Agriculture and Forestry (AGFO)
The Senate of Canada
Ottawa, Ontario
Canada K1A 0A4

Dear Senators and Members of the Standing Committee on Agriculture and Forestry,

I am submitting this brief on behalf of The Fur-Bearers, a registered Canadian charity established in 1953 with a mission to protect wildlife and the environment. Our organization has a mandate to monitor the practices of commercial fur farms, and we were actively engaged on the issue of the SARS-CoV-2 outbreaks on mink farms in British Columbia in 2020-2021.

The purpose of this brief is to clarify inaccurate statements made by Mr. Robert Bollert, past president of the Canada Mink Breeders Association, during testimony on October 3, 2024, regarding Bill C-275.

During the testimony, Senator Paula Simons asked Mr. Bollert: “Did you have any instances in your farm or in your federation of people who either gave the mink COVID because they had COVID or caught COVID from mink?”

The response from Mr. Bollert was: “Initially, when mink were known to get -- to be able to contract COVID, it was in Denmark and they did a mass cull of the mink at that point in time. We, as Canada Mink Breeder’s Association, along with CFIA, were proactive, and we worked together to put some really strict biosecurity protocols in place. So, we actually were very lucky that the vast majority of farms across Canada didn’t have problems. Now, there was three incidences in BC where mink did contract COVID and they’re not sure whether it was from the people or - they just don’t know. They haven’t been able to prove it.”

This brief addresses two claims in this statement: 1) “They” (assuming ‘they’ refers to public health authorities) do not know how mink became infected with the SARS-CoV-2 virus on British Columbia’s mink farms, and 2) “Really strict biosecurity protocols” were put in place on mink farms during the early years of the pandemic. To respond to these claims, evidence is provided from two sources:

- A series of three peer-reviewed articles published by The Public Health Agency of Canada in the journal Canada Communicable Disease Report (CCDR), regarding the response by public health authorities to the SARS-CoV-2 mink outbreaks in British Columbia from 2020-2021. These articles were authored by public health experts and

scientists from multiple provincial ministries, health authorities, universities, and public health agencies at the provincial and federal levels.

- WorkSafeBC workplace inspection reports of British Columbia’s mink farms in 2020 obtained through freedom of information legislation.

1) Is it the case that public health authorities do not know how mink became infected with the SARS-CoV-2 virus on British Columbia’s mink farms?

In their investigation into two of the SARS-CoV-2 outbreaks in British Columbia, public health researchers identified farm staff as the likely cause of the outbreaks, and found that both human-mink and mink-human transmission of the virus occurred: **“These findings point to a likely anthropogenic introduction of SARS-CoV-2 into farmed mink by farm staff, viral evolution in the mink host and then reintroduction into human hosts.”**¹ (Page 279).

2) Is it the case that there were “really strict biosecurity protocols” in place in the early years of the pandemic on British Columbia’s mink farms?

In their study examining the response to the mink farm outbreaks, the authors of the article *One Health response to SARS-CoV-2-associated risk from mink farming in British Columbia, Canada, October 2020 to October 2021*,² repeatedly identified weak implementation of biosecurity measures as challenges to the response by public health authorities. The following are observations noted by the response team:

- “In November 2020, PH (Public Health) attempted to discuss enhanced measures with a tepid response by industry.” (Page 262)
- “Inspections at Farm 1 found limited biosafety measure implementation.” (Page 263)
- “Initial inspections on all mink farms found weaker biosafety measure implementation than those recommended by the mink farm biosafety advisory group.” (Page 263)
- “Some operators’ COVID-19 Safety Plans were found lacking, and some reported that they thought recommendations were challenging, confusing, and unnecessary.” (Page 263)
- “Initial farm inspections revealed weak biosafety measure implementation, resulting first in communication encouraging strengthening of those measures followed by a Public Health Order mandating specific measures.” (Page 266)

¹ Paiero A, Newhouse E, Chan YLE, Clair V, Russell S, Zlonsnik J, Prystajecy N, Fraser E. SARS-CoV-2 in mink farms in British Columbia, Canada: A report of two outbreaks in 2020–2021. *Can Commun Dis Rep* 2022;48(6):274–81. <https://doi.org/10.14745/ccdr.v48i06a05>

² Clair V, Chan YLE, Paiero A, Fraser E, Gunvaldsen R, Newhouse E. One Health response to SARS-CoV-2-associated risk from mink farming in British Columbia, Canada, October 2020 to October 2021. *Can Commun Dis Rep* 2022;48(6):261–73. <https://doi.org/10.14745/ccdr.v48i06a04>

- “Mandatory vaccination and the worker COVID-19 surveillance program were acceptable to the industry; however, mandatory enhanced PPE usage and other biosafety measures were challenging. Skepticism regarding effectiveness or necessity, costs and discomfort of PPE constituted some of the impediments.” (Page 267)

In addition to this research, hundreds of pages of WorkSafeBC inspection reports from the first year of the COVID-19 pandemic provide insight into the mink farm sector’s noncompliance with health and safety regulations.³ WorkSafeBC is the agency responsible for workplace compliance with provincial health and safety legislation in British Columbia.

WorkSafeBC inspection reports revealed systemic issues across British Columbia’s mink farm sector leading up to and during the disease outbreaks, including numerous contraventions of the *Workers Compensation Act* and *Occupational Health and Safety Regulation* by multiple mink farms. Issues observed by WorkSafeBC inspectors include:

- Employers failing to establish COVID-19 Safety Plans.
- Failure to demonstrate that workers were adequately trained and were following COVID-19 protocols.
- Employer failing to provide sufficient Personal Protective Equipment (PPE) to workers.
- Employer was observed not wearing PPE as required in his own written procedures.
- Workers not wearing PPE.
- No written procedures for workers to reference for handling live and dead mink in order to protect themselves from COVID-19 transmission.
- No handwashing stations, soap, or paper towels in designated areas.
- Blood and biological materials contaminating various surfaces and machinery.
- Feed carts travelling between designated zones without being disinfected.
- No consistent procedures for sanitizing machinery and tools.
- No protocols to address decontamination and absence of proper hygiene controls.

Beyond the failures to implement and adhere to workplace biosecurity protocols, a further challenge arose when officials captured three escaped minks infected with the SARS-CoV-2 virus on a mink farm, which ultimately resulted in a moratorium on mink farming by the Provincial Health Officer in July 2021.⁴ The moratorium was followed by a provincial mink farming ban, announced in November 2021, due to the sector’s public health risks.⁵

³ WorkSafeBC. Freedom of information request 2021-0476. <https://thefurbearers.com/wp-content/uploads/2021-0476-WorkSafeBC-Fur-Farm-Inspection-Reports.pdf>

⁴ Strang T, Flockhart L, Thacker C, Schwantje H, Soos C, Dibernardo A, Lindsay LR, Toledo NPL, Beauclerc K, Fraser E, Prystajec N, Himsworth C. SARS-CoV-2 wildlife surveillance surrounding mink farms in British Columbia, Canada. *Can Commun Dis Rep* 2022;48(6):252–60. <https://doi.org/10.14745/ccdr.v48i06a03>

⁵ BC Ministry of Agriculture and Food. (November 2021). Mink farming phase out planned in B.C. <https://news.gov.bc.ca/releases/2021AFF0066-002112>

The outbreaks of SARS-CoV-2 on three British Columbia mink farms should serve as an instructive case for the committee as it continues its deliberations over Bill C-275.

Finally, given that biosecurity standards in Canada's fur farm industry are voluntary, our organization strongly supports mandatory biosecurity standards for the sector. This sentiment is shared with Mr. Bollert, who also expressed support for mandatory biosecurity standards during his testimony.

Thank you for your consideration of this evidence and please do not hesitate to contact us if you require further information.

Sincerely,



Lesley Fox
Executive Director – The Fur-Bearers
604-435-1850