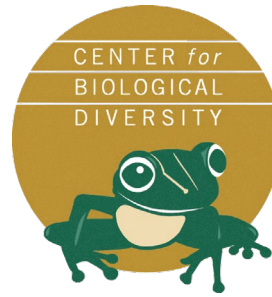




**THE HUMANE SOCIETY
OF THE UNITED STATES**



March 12, 2024

Representative Rick Hansen, Chair
Environment and Natural Resources Finance and Policy
Minnesota House of Representatives
100 Rev. Dr. Martin Luther King Jr. Blvd.
Saint Paul, MN 55155

RE: SUPPORT for HF 4844

Greetings Chair Hansen and Members of the Committee,

On behalf of the Humane Society of the United States, the Center for Biological Diversity, and our Minnesota supporters, we thank you for the opportunity to comment on HF4844. We support HF 4844 and we greatly appreciate the introduction of this important bill, specifically regarding the improvements to Minnesota's fur farming industry. The passage of HF 4844 will ensure much needed oversight of fur farms while also reducing the serious biosecurity risks these facilities pose.

While we support HF 4844, we simultaneously call on this legislature to take the inevitable step of ending the fur farming industry in Minnesota altogether. Ending fur production would alleviate many cruelty, natural resources, and public health risks. Furthermore, the use of agency resources to regulate this plummeting industry seems unnecessary when only a handful of these facilities remain in the state. According to the Minnesota Department of Natural Resources, only six commercial game farm license holders have indicated that they possess mink and at least one of these licensees appears to be a rescue,¹ not a fur farm.

Fur farms are inherently cruel facilities that hold wild animals captive in cramped, wire-floored cages, solely for fashion. Since animals held in fur farms are not raised for consumption, the industry is typically not subject to animal welfare or humane slaughter laws, including in Minnesota. These wild animals are deprived of the ability to engage in natural behaviors like swimming, digging, and running. The living conditions on fur farms often drive animals to engage in self-mutilation, pacing, and other behaviors that clearly demonstrate their suffering.² Investigations across the world show animals living in horrific conditions and neglect. Many are found with open and infected wounds, and others are found dead left to decay in cages next to other animals, and there are even reported instances of cannibalism.

Increased oversight of fur farms through HF 4844 is undoubtedly necessary if these facilities are allowed to continue operating in the state, but it will not alleviate the very real animal welfare, environmental, and public health problems these facilities pose. Fur-farmed animals escape their enclosures on occasion, exposing themselves to wild populations and creating opportunities for disease spread. In other words, the mere presence of fur farms in Minnesota poses a threat to the state's wildlife. Therefore, we urge the Minnesota legislature to consider prohibiting fur farming in the state.

¹ The licensee is SaveAFox Rescue, a 501(c)3 non-profit organization.

² E.g., Pickett, H. and Harris, S. *The Case Against Fur Factory Farming: A Scientific Review of Animal Welfare Standards and Welfur, Respect for Animals*, 24 (2015). Retrieved from <https://www.furfreealliance.com/wp-content/uploads/2015/11/Case-against-fur-farming.pdf>.

I. Fur farms pose a serious public health risk that requires proactive surveillance.

A growing body of research demonstrates that fur production facilities (“fur farms”) pose a threat to public health due to their potential for spreading disease. The undisputed link between mink and the mutation and spread of COVID-19 has been well documented worldwide. Captive mink raised for their fur are among the most vulnerable non-human animals susceptible to catching and spreading the virus. This is both because of the confined, stressful conditions in which they are raised, which compromises their immune systems and facilitates viral transmission,³ and because of the human-like structure of their angiotensin-converting enzyme 2 (“ACE2”) receptors, which allows the SARS-CoV-2 spike protein to effectively bind to and enter (i.e., infect) their cells.⁴ Since the beginning of the pandemic, more than 20,000 captive mink on at least 17 U.S. mink farms have died from the disease,⁵ while millions more have either died from the disease or been killed to prevent its spread in more than 400 European fur farms.⁶

These losses have further damaged an industry already in decline.⁷ The last time Minnesota fur farms reported mink fur pelt numbers to the U.S. Department of Agriculture (“USDA”) was in 2021 with 38,920 pelts. That’s a 78% drop from 2017 numbers when there were 13 fur farms. Nationally, mink pelt production has dramatically declined each year, with just 1.33 million pelts and 110 fur farms in 2022. These changes reflect our Nation’s movement away from the wildlife, public health and animal welfare risks these operations present.

While the outbreaks of SARS-CoV-2 on mink farms have been devastating, they have not been surprising. Operating guidelines developed by the Fur Commission USA, an association that represents U.S. mink farmers, warn that disease transmission is a risk inherent to mink farming:

Due to industry characteristics, mink farms have been expanding in size and in many cases there are multiple farms in close proximity to each other. This high density of animals increases the chance of disease transmission. Small farms are at just as much risk for disease as large farms; biosecurity concerns are everyone’s concerns.⁸

Farmed mink are unique not only in their susceptibility to the virus, but also in their ability to transmit it. To date, captive mink are the only animals verified to have transmitted the virus directly to humans.⁹ It is also possible that captive or escaped mink have or could spread the virus to wild mink or other animals that may live on or near mink fur operations, such as cats,¹⁰ bats,¹¹ and deer mice.¹² In addition, live mink are not the only potential transmission vector found on mink farms; the virus could also be transmitted

³ See, e.g., Jonathan Anomaly, What’s Wrong with Factory Farming?, 8 PUB. HEALTH ETHICS 246 (2015); Jeanette I. Webster Marketon, Stress hormones and immune function, 252, Cellular Immunology 16 (2008).

⁴ See, e.g., Yulong Wei et al., Predicting mammalian species at risk of being infected by SARS-CoV-2 from an ACE2 perspective, SCI. REPORTS., Jan. 2021.

⁵ Florence Fenollar et al., Mink, SARS-CoV-2, and the Human-Animal Interference, Frontiers in Microbiology, Apr. 2021, at 7; USDA APHIS, Confirmed Cases of SARS-CoV-2 in Animals in the United States, <https://www.aphis.usda.gov/aphis/dashboards/tableau/sars-dashboard> (last updated Sept. 13).

⁶ Id. at 2, 6.

⁷ U.S. Department of Agriculture, Economics, Statistics and Market Information System: Mink, 2023. Retrieved from <https://usda.library.cornell.edu/concern/publications/2227mp65f>.

⁸ John S. Easley D.M.V., Fur Commission USA, Standard Guidelines for the Operation of Mink Farms in the United States, Book 3: Biosecurity Protocols for Mink in the United States, 1 (2019).

⁹ COVID-19: Animals and COVID-19, CDC (Aug. 5, 2021), <https://www.cdc.gov/coronavirus/2019-ncov/daily-lifecoping/animals.html>.

¹⁰ Jianzhong Shi et al., Susceptibility of Ferrets, Cats, Dogs, and Other Domesticated Animals to SARS-Coronavirus 2, 368 SCI. 1016, 1019 (2020).

¹¹ Arinjay Banerjee et al., Zoonothropotic Potential of SARS-CoV-2 and Implications of Reintroduction into Human Populations, 29 CELL HOST & MICROBE 160, 163 (2021).

¹² Anna Fagre et al., SARS-CoV-2 Infection, Neuropathogenesis and Transmission Among Deer Mice: Implications for Spillover to New World Rodents, PLOS PATHOGENS, May 2021, at 2.

through feces, carcasses and fur, wastewater and surface water runoff, and secondarily through other animals originally infected by mink.

It's not just COVID-19 that poses a risk. We are now seeing increasing outbreaks of highly pathogenic avian influenza (HPAI) A (H5), first on a mink farm in Spain where mammal-to-mammal transfer was likely to have occurred, raising pandemic fears amongst scientists.¹³ Now, outbreaks are being reported throughout Finland from fur farms housing mink, fox, and raccoon dogs, where the virus was also said to have undergone a mutation.¹⁴ To date, outbreaks have occurred on dozens of fur farms and more than 300,000 animals have been culled, with the number growing almost daily. Furthermore, a well-recognized concern exists that prolonged replication of the HPAI virus in fur farms might lead to viral forms that could more easily spread among and between humans.¹⁵

Research has found that HPAI is spreading to and between fur farmed animals by seabirds.¹⁶ As open-air environments, contact with birds and bird feces can be a common occurrence in fur farms. According to the Centers for Disease Control and Prevention, there have been more than 900 HPAI A(H5) outbreaks in U.S. birds since January 2022, with 128 of these occurring in Minnesota alone.¹⁷ The symptoms of animals infected with HPAI can vary from severe to very mild, and can even be asymptomatic.¹⁸ As such, proactive disease testing is necessary even when animals do not have any symptoms.

II. Fur farms are harmful to the environment, including wildlife.

Fur farms are harmful to Minnesota's wildlife and wild spaces. Fur farms contaminate soil and waterways with waste runoff from animals. As mentioned above, this can lead to the spread of infectious diseases to humans and wildlife via environmental contamination. Moreover, farmed mink that escape their enclosures, which is a common occurrence, can directly spread diseases to wildlife they come into contact with, introducing novel diseases to sensitive populations of furbearers and other susceptible wildlife.

In addition to their immediate environmental impacts, fur farms produce long-term damage to the environment. According to a recently published report by carbon footprint experts, the environmental impacts of fur production significantly exceed those of other materials used in fashion, including cotton, polyester and acrylic.¹⁹ Fur production contributes significantly to high levels of greenhouse gas emissions as well as water consumption. In fact, water consumption for fur production is 104 times higher than acrylic, 91 times higher than polyester and five times higher than cotton.²⁰

¹³ Peacock, T. P. and W. S. Barclay, Mink farming poses risks for future viral pandemics, *Proceedings of the National Academy of Sciences* (2023), 120(30): e2303408120.

¹⁴ Lindh Erika, et al., Highly pathogenic avian influenza A(H5N1) virus infection on multiple fur farms in the South and Central Ostrobothnia regions of Finland, July 2023. *Euro Surveill.* 2023;28(31), <https://www.eurosurveillance.org/content/10.2807/1560-7917.ES.2023.28.31.2300400>.

¹⁵ *Id.*

¹⁶ Finnish Food Authority, The virus line that circulates especially among seagulls has been confirmed as the cause of bird flu infections in fur animals, July 2023. Retrieved from <https://www.ruokavirasto.fi/elaimet/elainten-terveys-ja-elaintaudit/elaintaudit/ajankohtaista-elaintaudeista/turkiselainten-lintuinfluenssatartuntojen-aiheuttajaksi-on-varmistunut-erityisesti-lokkien-keskuudessa-kiertava-viruslinja/>.

¹⁷ Centers for Disease Control and Prevention, H5N1 Bird Flu Detections across the United States (Backyard and Commercial). Retrieved November 16, 2023 from <https://www.cdc.gov/flu/avianflu/data-map-commercial.html>.

¹⁸ Finnish Food Authority, The Food Agency orders all animals to be euthanized from fur farms infected with bird flu, September 2023. Retrieved from <https://www.ruokavirasto.fi/elaimet/elainten-terveys-ja-elaintaudit/elaintaudit/ajankohtaista-elaintaudeista/ruokavirasto-maaraa-kaikki-elaimet-lopetettavaksi-lintuinfluenssatartunnan-saaneilta-turkistarhoilta/>.

¹⁹ Fur's Dirty Footprint, 2023. This report was created by Foodsteps, commissioned by Humane Society International/UK, and reviewed by renowned sustainability expert Dr Isaac Emery. https://www.hsi.org/wp-content/uploads/2023/06/HSI_UK-Furs-Dirty-Footprint_Jun23.pdf.

²⁰ *Ibid.*

III. Conclusion.

We support the passage of HF 4844 if this industry is allowed to continue in Minnesota. However, we do not believe the animal welfare concerns as well as the significant risks that these facilities pose to environmental and public health are worth Minnesota's resources, including agency staff time to properly and thoroughly regulate them. Therefore, we believe Minnesota's legislature and state agencies must facilitate the phasing out of the fur farming industry altogether. Thank you for your consideration.

Sincerely,

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My name is Aaron Zellhoefer, I am a resident of Minnesota and I wanted to express my support for HF4844.

HF4844 will ensure much needed oversight of fur farms while also reducing the serious biosecurity risks these facilities pose. I am particularly supportive of the bills' required development of containment and disposal requirements for fur farms and disease testing and reporting requirements. Fur farms pose serious environmental and public health risks.

I appreciate the proposed fee program for fur farms to help cover agency expenses to properly regulate these facilities; and, taking into consideration the staff time and risk to Minnesota that these farms pose, it is evident that they greatly outweigh any benefit of allowing them to continue. Going off the DNR's numbers, it is evident that the fur farming industry has essentially collapsed. According to the DNR's numbers there are a total of 210 animals in fur farms, and at least one of these facilities is a 501c3, animal rescue, not a fur farm.

The DNR has it right in their report stating, "[a]dditional concerns raised included the welfare of farmed mink and desires to ban mink farming."

Rather than spending agency resources on regulating this inherently cruel and environmentally polluting industry, I ask this committee to phase out the fur farming industry.

Animals held captive in fur farms spend their entire lives living in cramped, wire-bottom cages, solely to be killed for fashion. Mink are semi aquatic animals, who are deprived of their ability to be in water while on fur farms. Since animals held in fur farms are not raised for consumption, the industry is not subject to animal welfare or humane slaughter laws. These essentially wild animals are deprived of the ability to engage in natural behaviors, and suffer with open and infected wounds. Once they are ready for pelting, captive mink are typically killed by gassing, or neck breaking, and foxes are killed by anal electrocution.

Additionally, confining wild animals in close, unsanitary quarters poses a serious biosecurity risk, including from diseases such as COVID-19 and avian influenza. According to the DNR, "mink are highly susceptible to a number of viruses that can also infect people." And the DNR's data also shows that there has been spillover from mink farms with these viruses in 4 different states and a total of 9 different countries.

Lastly, according to a recently published report by carbon footprint experts, the fur industry has the largest negative environmental impact of any material used for fashion, in terms of greenhouse gas emissions, waste runoff, water consumption, and toxicity.

Therefore, I support HF4844 and believe it is a critical bill if fur farms are allowed to operate in Minnesota. Now is the time to end fur farming in Minnesota altogether, protecting animals, the environment, and public health. Thank you for your consideration.