

## RE: Code of Practice comment period.

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From: Anderson, Arlene AGRI:EX s.15  
s.15  
-ANDERSON, ARLENE>  
To: Giacomazzi, Terri AGRI:EX  
Sent: January 19, 2021 2:29:24 PM PST  
Received: January 19, 2021 2:29:24 PM PST

A very good idea and I agree BC needs to comment

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**From:** Giacomazzi, Terri AGRI:EX  
**Sent:** January 19, 2021 2:24 PM  
**To:** Anderson, Arlene AGRI:EX  
**Subject:** Code of Practice comment period.

Arlene,

The proposed amendments to the Code of Practice for the Care and Handling of Farmed Mink is still available for review and comment according to the following schedule on the NFACC website:

*Public Comment Period launch date: Monday, December 7, 2020*

*Closing date for comments: Thursday, February 4, 2021*

*Status: Open for review and comments*

I know we are already swamped but I think it would be prudent for me to review the proposed amendments and coordinate a Ministry response with Dr. Rayna, if possible. At the bare minimum, it would give us an opportunity to see what changes are proposed. But, this all takes time! If you are agreeable, I will start to coordinate this/look at this when I get some free. And then once I have taken a look could touch base with you again re if/how to provide comment...? FYI, JM did ask if we have provided comments in her notes.

What do you think?

T.

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag  
Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

*Please note: I am currently working from home. If you do not reach me at the number listed above, please leave me a message and I will return your call as soon as I am able. Alternatively, please send me an email to arrange a suitable call back time. Thank you.*

***Issues identified for amendment and high-level guide to the proposed amendments  
(context to support those participating in the public comment period)***

Issues identified as part of the 5-year review of the 2013 mink Code	Amendments proposed by the Code Amendment Committee (for review during the public comment period – <b>please see all tracked changes in the specific sections</b> )
<b>Section 1.2.2 Pens</b>	
<p>Below Table 1 (in the 2013 Code), it is stated: “If lowering the feed strip, the lowered portion of the pen must have a minimum height of 12 inches (in) and extend to a maximum of 10 in.” In the assessment, the committee accepted 10 in minimum height of feed strip of pens that fall into Tables 2 &amp; 3. This is not stated below these tables. Industry feels that similar statements should be listed below Tables 2 &amp; 3 accepting minimum feed strip heights of 10 in.</p>	<ul style="list-style-type: none"> <li>- The bullet points on lowering the feed strip and meeting the requirements for juveniles by August 1<sup>st</sup> or September 1<sup>st</sup> of each year have been moved up and amended to clarify that they apply to all pens (whether Table 1, 2 or 3).</li> </ul>
<p>In the 2013 Code, the minimum height requirement for new pens is 15 inches (in) and 14 in for existing pens to be used for their lifetime. Recent research suggests that increased pen heights do not significantly improve welfare. And pen heights that are too high inhibit feed access especially for young kits. Concerns were also raised that more time is needed for the entire industry to transition to new pens and for new research to be done that can inform a clear, evidenced-based national standard.</p>	<ul style="list-style-type: none"> <li>- Recent research on pen heights noted in the amended preamble (and citation given at the bottom of the section)</li> <li>- Context on the challenges of financing a transition to larger pens is outlined in new text that appears immediately above the requirements. This new text also outlines specific commitments made by industry and partners as it relates to research and overall improvements to the mink’s environment.</li> <li>- A minimum height was added to Table 3 to clarify this minimum expectation in these existing pens (any pens not meeting this minimum would not be acceptable).</li> </ul>
<b>Section 1.2.3 Nest Boxes</b>	
<p>While implementing this section’s requirements through the on-farm assessment, concerns were raised about the requirement to have a nest box with adequate bedding during whelping, lactation, furring, and winter months. Specifically, the winter climate varies considerably across Canada and some areas of B.C. occasionally experience warm winter periods, and it may be more humane to remove the nest box to promote gradual weight loss (rather than drastically reducing the feed to condition the mink for breeding).</p>	<ul style="list-style-type: none"> <li>- First requirement in this section amended to mention the need to maintain the cleanliness of the nest box and bedding (for warmth during cold temperatures, comfort, and hygiene).</li> <li>- New requirement added outlining removal of the nest box in the context of re-training individual mink.</li> <li>- New requirement added explaining that, as a last resort (after gradual feed changes and early breeding), the nest box may be temporarily removed during warm winter periods if mink have another resource that permits them to hide.</li> </ul>

<p>In addition, it is sometimes necessary to briefly remove the nest box to re-train individual mink not to soil in the nest box (to keep the area clean thereby safeguarding mink health and comfort).</p>	<ul style="list-style-type: none"> <li>- The need to primarily condition mink through gradual dietary changes is further reinforced in an amended requirement in Section 3.1.1.</li> <li>- New recommendations added to Section 1.2.3 outlining other strategies to support conditioning mink including in regions that may see temporary warm winter periods.</li> </ul>
<b>Section 3.1 Nutrition</b>	
<p>This section of the 2013 Code requires that pens of mink that are over and under conditioned must be marked so the mink may be monitored more closely and fed accordingly. Concerns were raised that this requirement is vague and could be improved by defining the specific body condition scores that are too thin or over-conditioned (using the 1-5 scale given in Appendix A).</p>	<ul style="list-style-type: none"> <li>- Specific body condition scores that make mink too fat or too thin were added as amendments to the 3<sup>rd</sup> requirement in this section.</li> </ul>
<b>Section 3.1.1 Breeding Mink</b>	
	<ul style="list-style-type: none"> <li>- The first requirement in this section was amended based on the discussions on temporarily removing the nest box should there be a period of warm winter temperatures. It was felt that we needed to further reinforce the expectation that producers primarily rely on gradual, early dietary changes to condition breeders. The proposed amendment to Section 1.2.3 clarifies that nest box removal is a last resort after gradual feed changes and early selection of breeders.</li> <li>- New recommended practices added to complement the amended requirement.</li> </ul>
<b>Section 5.1 Animal Handling</b>	
<p>In the 2013 Code, there is reference to the proper method of carrying a mink (which involves supporting the mink's body); however, there is no reference to the proper method of catching a mink and lifting it from its pen. The common practice, which appears to cause minimal stress to mink compared to other methods of catching/lifting, is to lift mink from the base of tail but this is not clarified in the current Code.</p>	<ul style="list-style-type: none"> <li>- To address any possible risk of injury or pain associated with lifting or handling mink, preventing pain and injury was added to the 2<sup>nd</sup> requirement.</li> <li>- A requirement outlining the acceptable technique to lift mink was added with clarification on how long they may be carried this way and when the body must be supported.</li> <li>- Recommended practices were added or amended to complement the new requirements (as well as existing requirements).</li> </ul>

<b>Section 6.1 Euthanasia Methods</b>	
Carbon monoxide (CO) from a compressed gas cylinder is the only acceptable method of euthanasia in the 2013 Code. Concerns were raised that the Code should clarify acceptable back-up methods should CO from a compressed gas cylinder be temporarily unavailable or should new health and safety regulations prohibit its use. Most, if not all Codes, outline more than one acceptable euthanasia method.	<ul style="list-style-type: none"> <li>- Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references.</li> <li>- The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method.</li> </ul>
<b>Section 6.2 Evidence to Confirm Death</b>	
Concerns were raised that five different indicators must be checked when using an accepted method of euthanasia. Overall, it was felt that it was not practical to check all five indicators and that some indicators were difficult to reliably/consistently check on farm.	<ul style="list-style-type: none"> <li>- The requirement was amended to clarify the two indicators that must be checked to confirm death.</li> <li>- Context was added to the preamble explaining the need to assess/re-assess breathing over 5 minutes.</li> </ul>



## FW: NFACC Codes Proposed Changes

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From: Anderson, Arlene AGRI:EX s.15  
-ANDERSON, ARLENE>  
To: Giacomazzi, Terri AGRI:EX, Yawney, Lauren AGRI:EX, Daniels, Gray AGRI:EX  
Sent: January 28, 2021 3:13:43 PM PST  
Received: January 28, 2021 3:13:44 PM PST  
Attachments: NFACC Proposed Amendments Summary.pdf, NFACC Proposed Amendments - cage sizes.pdf, NFACC Proposed Amendments - euthanasia.pdf

fyi

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**From:** Anderson, Arlene AGRI:EX

**Sent:** January 28, 2021 2:56 PM

**To:** McGuire, Jennifer AGRI:EX ; Viney, Ursula E AGRI:EX

**Subject:** NFACC Codes Proposed Changes

In terms of proposed amendments to the National Farmed Animal Care Codes (NFACC) Farmed Mink Codes the rationale for:

s.13

The attachments are from the NFCAA public consultations on the proposed changes to the Code.  
Arlene

Page 06 of 86 to/à Page 13 of 86

Withheld pursuant to/removed as

s.13

## RE: mink code comments

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From: Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>, Hughes, Marie Julie AFF:EX <MarieJulie.Hughes@gov.bc.ca>  
To: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>, Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>, Giacomazzi, Terri AFF:EX, Cuthbert, Erin AFF:EX  
Sent: February 2, 2021 11:16:16 AM PST  
Received: February 2, 2021 11:16:17 AM PST  
Attachments: image002.jpg, image003.jpg  
Thanks – I look forward to seeing their proposals 😊

*Julie*

(Marie) Julie Hughes  
Compliance, Operations and Data Officer  
British Columbia Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road, Abbotsford, BC V3G 2M3  
Tel: 778-666-0560  
[Mariejulie.hughes@gov.bc.ca](mailto:Mariejulie.hughes@gov.bc.ca)  
[www.gov.bc.ca/animalhealthcentre](http://www.gov.bc.ca/animalhealthcentre)



Where ideas work



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**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** February 2, 2021 11:15 AM  
**To:** Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>; Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>  
**Subject:** RE: mink code comments

Yes, I will forward you what I received from NFACC. As I understand it, there is not a revised code to review. It is only a table of proposed changes to the existing. Which I find a bit odd, but that is how they are doing this 5 year review.

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**From:** Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>  
**Sent:** Tuesday, February 2, 2021 11:13 AM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>; Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>  
**Subject:** RE: mink code comments

Good morning Terri,

I had a look at the NFACC site and was able to see the existing Code of Practice, and I could see the articles they wanted to change, but not the actual changes they wanted to make to those articles without going through the whole process. Do you have a list of the proposed changes? If so, then I can provide you with my comments.

Thanks,

*Julie*

(Marie) Julie Hughes  
Compliance, Operations and Data Officer  
British Columbia Ministry of Agriculture, Food and Fisheries

1767 Angus Campbell Road, Abbotsford, BC V3G 2M3

Tel: 778-666-0560

[Mariejulie.hughes@gov.bc.ca](mailto:Mariejulie.hughes@gov.bc.ca)

[www.gov.bc.ca/animalhealthcentre](http://www.gov.bc.ca/animalhealthcentre)



Where ideas work



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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** February 2, 2021 11:01 AM

**To:** Hughes, Marie Julie AGRI:EX <[MarieJulie.Hughes@gov.bc.ca](mailto:MarieJulie.Hughes@gov.bc.ca)>; Cuthbert, Erin AGRI:EX <[Erin.Cuthbert@gov.bc.ca](mailto:Erin.Cuthbert@gov.bc.ca)>

**Subject:** FW: mink code comments

Hello Julie and Erin,

I'm coordinating a Ministry response on the proposed NFACC mink code updates and I understand you both provided individual responses through NFACC's online public consult process...?

I wonder if you could share your feedback with me to include in our Ministry response. The deadline is coming up in two days and I'd like to put something together by end of day today if possible. Is that something you could share? I am also going to try to get a couple of day extension from NFACC if possible.

Thank you,  
Terri.

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**From:** Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>

**Sent:** Monday, February 1, 2021 3:31 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>; Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>

**Cc:** Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>

**Subject:** RE: mink code comments

Thank you Terri. I agree with your approach. I think we could just leave it with the four of us for now as it was fairly confusing to try to solicit input.

I'd be happy to work on a process with you. I think it should be consistent and come with clear instructions so everyone knows how and when to get responses in.

Rayna

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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** February 1, 2021 2:03 PM

**To:** Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>; Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>

**Cc:** Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>

**Subject:** RE: mink code comments

Thank you for this information Rayna.

I think then what might be a reasonable approach is if I reach out directly to both Julie and Erin to obtain their general feedback so as to guide/create a general Ministry response. If there are other individuals I should reach out to please advise. I will incorporate the feedback then from at least the four of us in a general response which will then go through Director, ED and Executive approval.

I will still target a completed draft by end of day tomorrow. If, however, an extension is necessary, I will request that of NFACC but I would prefer to have a draft complete tomorrow if possible. The public comment period ends February 4<sup>th</sup>.

Please let me know as soon as possible if you have a different recommended approach.

In hindsight, it would have been useful to have one person facilitating this response earlier. In the past key, staff responsible for a particular sector have taken typically on that role. Perhaps we could figure out a better process for the future. Of note, the goat code is also currently open to public comment until February 22, 2021.

Terri.

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**From:** Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>  
**Sent:** Monday, February 1, 2021 1:21 PM  
**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>; Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>  
**Cc:** Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>  
**Subject:** RE: mink code comments

Thank you Terri. I don't think I need to submit individually if we're submitting a ministry response. I wasn't sure how to instruct people to provide comment, so I did just encourage people to comment on their own. I found this to be a confusing process, is there an easier way to consolidate responses?

I've been recommending that all the veterinarians in the branch, including pathologists, our public health veterinarian and our epidemiologist, to comment. I asked Julie to comment, and one of our dairy inspectors has a masters' in animal welfare so I've asked for her comments as well.

Rayna

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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Sent:** February 1, 2021 9:52 AM  
**To:** Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>; Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>  
**Cc:** Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>  
**Subject:** RE: mink code comments

Good Morning all.

Thank you for your comments Rayna. I'm planning to draft a Ministry response, incorporate your comments, and bring it back to our small group before finalizing. This is similar to our approach on other code reviews. If you would like to additionally submit your comments individually Rayna, I think that would be fine from my perspective.

I'd like to have all feedback by end of day today and then I will have a final draft for review tomorrow. Is there anyone else we should include to provide feedback? I'd like to ask Julie since she has such in-depth knowledge of on farm practices. Ursula, please advise. And is there anyone else to include?

Thank you all,  
Terri.

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**From:** Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>  
**Sent:** Thursday, January 28, 2021 1:49 PM  
**To:** Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>; Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Cc:** Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>  
**Subject:** mink code comments

I've attached what I intend to comment on the mink code. I can hold off and comment on behalf of the ministry if you like or submit these as my personal comments.

Rayna

**Rayna E. Gunvaldsen BSA DVM MSc**

Chief Veterinarian

Animal Welfare and Dairy Program Veterinarian

BC Ministry of Agriculture, Food, and Fisheries

## FW: NFACC Contact Form

From: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
To: Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>, Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>  
Sent: February 2, 2021 11:18:49 AM PST  
Received: February 2, 2021 11:18:50 AM PST  
Attachments: image001.png, Issues identified for amendment and overview of proposed amendments.pdf

This attached table is apparently what one will find when they do NFACC's online survey monkey.

Maybe we should also comment on the review process!!

I'm open to your suggestions about how to provide a Ministry response. I have the recent salmonid response which I can forward if you wish. But, that may be more information than necessary. Let me know if you would find that helpful.

Thank you!  
T.

---

**From:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Sent:** Wednesday, January 27, 2021 12:14 PM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: NFACC Contact Form

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good afternoon Terri,

Would the attached document be of assistance?

Regards,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

From: Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>  
Sent: January 27, 2021 12:55 PM  
To: [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)  
Subject: NFACC Contact Form

A form submission has been received from <https://www.nfacc.ca/contact-us>

NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

MESSAGE: Hello all,

Would it be possible to access a pdf of the proposed milk code without doing the survey? We plan to provide a single BC Ministry response and have a few staff who would like to review but I don't see the proposed code on your website other than taking the survey...? If it is there could you please direct me to where it is located? Thank you! Terri.

SEARCH PHRASE: (not provided)



## RE: NFACC Contact Form

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From: Hughes, Marie Julie AGRI:EX s.15  
0-Hughes, Marie Jul>  
To: Giacomazzi, Terri AGRI:EX, Cuthbert, Erin AGRI:EX  
Sent: February 2, 2021 11:33:11 AM PST  
Received: February 2, 2021 11:33:00 AM PST  
Attachments: image003.png, image001.jpg

Hi Terri,

The revised salmonid response might be useful, just so I don't go off on a tangent. I will get you my comments by end of day today. Thanks for all of your help,

*Julie*

(Marie) Julie Hughes  
Compliance, Operations and Data Officer  
British Columbia Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road, Abbotsford, BC V3G 2M3  
Tel: 778-666-0560  
[Mariejulie.hughes@gov.bc.ca](mailto:Mariejulie.hughes@gov.bc.ca)  
[www.gov.bc.ca/animalhealthcentre](http://www.gov.bc.ca/animalhealthcentre)



Where ideas work



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**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** February 2, 2021 11:19 AM  
**To:** Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>; Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>  
**Subject:** FW: NFACC Contact Form

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Thank you!  
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**Sent:** Wednesday, January 27, 2021 12:14 PM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
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Regards,



Liz McConnell

Email [liz@nfacc.ca](mailto:liz@nfacc.ca)

Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

From: Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

Sent: January 27, 2021 12:55 PM

To: [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

Subject: NFACC Contact Form

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EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

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Terri.

SEARCH PHRASE: (not provided)

## RE: NFACC Contact Form

---

From: Hughes, Marie Julie AGRI:EX <s.15 s.15  
0-Hughes, Marie Jul>  
To: Giacomazzi, Terri AGRI:EX, Cuthbert, Erin AGRI:EX  
Cc: Gunvaldsen, Rayna AGRI:EX, Viney, Ursula E AGRI:EX  
Sent: February 2, 2021 12:49:12 PM PST  
Received: February 2, 2021 12:49:00 PM PST  
Attachments: image004.png, image002.jpg

Hi Terri,

I have reviewed the items identified for amendment and compared them to the existing codes. The only two I have concerns with are Section 6.1 Euthanasia Methods and Section 6.2 Evidence to Confirm Death. I realize that the information provided is a summary and not necessarily what will be revised in the code, however, I believe more information should have been provided. Particularly:

Section 6.1 Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

I realize that there may be information in the preamble, however, appropriate wording such as "CO2 from a compressed cylinder **may** be used for euthanizing mink on farm in the absence of CO." I think it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

Section 6.2 Evidence to Confirm Death "The requirement was amended to clarify the two indicators that must be checked to confirm death." "Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes."

Which are the two indicators of the previously recommended five that are now acceptable?

Let me know if any of the above requires additional information. Thanks,

*Julie*

(Marie) Julie Hughes  
Compliance, Operations and Data Officer  
British Columbia Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road, Abbotsford, BC V3G 2M3  
Tel: 778-666-0560  
[Mariejulie.hughes@gov.bc.ca](mailto:Mariejulie.hughes@gov.bc.ca)  
[www.gov.bc.ca/animalhealthcentre](http://www.gov.bc.ca/animalhealthcentre)



Where ideas work



---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>

**Sent:** February 2, 2021 11:19 AM

**To:** Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>; Cuthbert, Erin AGRI:EX <Erin.Cuthbert@gov.bc.ca>

**Subject:** FW: NFACC Contact Form

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**Subject:** RE: NFACC Contact Form

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good afternoon Terri,

Would the attached document be of assistance?

Regards,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

**From:** Terri Giacomazzi <terri.giacomazzi@gov.bc.ca>  
**Sent:** January 27, 2021 12:55 PM  
**To:** [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)  
**Subject:** NFACC Contact Form

A form submission has been received from <https://www.nfacc.ca/contact-us>

NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

MESSAGE: Hello all,

Would it be possible to access a pdf of the proposed mink code without doing the survey? We plan to provide a single BC Ministry response and have a few staff who would like to review but I don't see the proposed code on your website other than taking the survey...? If it is there could you please direct me to where it is located? Thank you!  
Terri.

SEARCH PHRASE: (not provided)

## Conversation with Giacomazzi, Terri AGRI:EX

---

From: Giacomazzi, Terri AGRI:EX <terri.giacomazzi@gov.bc.ca>  
To: Giacomazzi, Terri AGRI:EX, Anderson, Arlene AGRI:EX  
Sent: February 3, 2021 3:02:45 PM PST  
Received: February 3, 2021 3:02:45 PM PST

**Giacomazzi, Terri AGRI:EX 2:45 PM:**

Hi Arlene, I just logged in to see if we got an extension from NFACC on submitting mink comments. We now have until Monday. I have not received comments from Erin, apparently she is out in the field inspecting dairy farms. So we only have Dr. Rayna's and Julie's comments. I wonder what we should do..? I can spend some time on it now and pass you a draft, unless there is someone else who could do it...? Basically, we just need to combine and I would add some language around the need for continual and substantial improvement in the codes, particular with respect to the requirements. we could use the salmonid cover letter as a template. But I d see that NFACC is still asking us to use the online survey monkey.

**Giacomazzi, Terri AGRI:EX 2:45 PM:**

If needed, I can do this but just wanted to check in and see what your thoughts are...?

**Anderson, Arlene AGRI:EX 2:47 PM:**

can we send through survey monkey as well

**Anderson, Arlene AGRI:EX 2:47 PM:**

don't wait for Erin

**Anderson, Arlene AGRI:EX 2:47 PM:**

I have no one else to do it right now. Are you able to do it Monday

**Giacomazzi, Terri AGRI:EX 2:49 PM:**

Not Monday s.22

But I can do it today or tomorrow at the latest.

What about approvals though? We would need to have enough time for that. Probably that would mean completing by end of day today I assume.

**Anderson, Arlene AGRI:EX 2:50 PM:**

that's right you are away.

**Anderson, Arlene AGRI:EX 2:50 PM:**

if you can complete by tomorrow evening I can make that work

**Giacomazzi, Terri AGRI:EX 2:50 PM:**

k, I'll get it done.

**Anderson, Arlene AGRI:EX 2:50 PM:**

ok, thans

**NFACC Code of Practice for the Care and Handling of Farmed Mink**  
**BC Ministry of Agriculture-Comments**

General Feedback:

- Provincial government review of codes typically includes staff from policy, operations and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and is internally approved by Executive. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide overall comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

**Section 1.2.2**

Pens:

This is a difficult situation and I am conflicted. If in 2013 it was determined that mink cage sizes needed to increase to optimize welfare, it is hard to accept walking back on this requirement even though profit margins over the past 10 years have considerably decreased. I also encourage further research on mink housing and, especially, enrichment, however if there is less money in the industry I wonder who will be funding this. What about a trade-off between enrichment and pen size? If pen size can't practicably be increased, could enrichment be improved? It wasn't clear to me that a table tennis ball was enough for the life of the animal.

**Section 1.2.3**

Nest boxes:

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements.

**Section 3.1**

Nutrition:

I appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

**Section 3.1.1**

Breeding Mink:

Is selection of breeders efficient prior to furring? Overall, I agree with the requirements and recommendations. The mink producers I have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: I do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

## **Section 5.1**

Animal Handling:

I wasn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

## **Section 6.1**

Euthanasia methods:

The literature seems to indicate very specific equipment for using CO from combustion. This is not clear in the suggested edits and seems to recommend CO from combustion engines. I really don't think this is appropriate both from a humane killing point of view, or human safety. It is also not clear that CO<sub>2</sub> is best practise considering its aversive nature to mammals and especially semi-aquatic mammals. The literature recommends 100% CO<sub>2</sub>, which is difficult to achieve and even then causes extended time to death and loss of consciousness. Humane killing recommendations have been moving further away from the use of CO<sub>2</sub> in mammalian species for these reasons in general. I would sincerely hope better methods are on the horizon. Has there been any work done on methods such as non-penetrating captive bolt in this species? There should also be a distinction between euthanasia (to prevent suffering from illness, disease, injury); humane killing (for harvest purposes); and depopulation (rapid killing for disease control). Methods of killing may have different requirements for all these purposes and the distinction is not clear as to what we're talking about in this document, and the reason for needing to use a less than humane method. Is there often shortages of CO during harvest, or in general?

In relation to:

Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

We realize there may be information in the preamble, however, appropriate wording such as "CO<sub>2</sub> from a compressed cylinder may be used for euthanizing mink on farm in the absence of CO." I think it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

## **Section 6.2**

Evidence to Confirm Death:

In relation to:

“The requirement was amended to clarify the two indicators that must be checked to confirm death.” “Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes.”

Which are the two indicators of the previously recommended five that are now acceptable?





February 4, 2021

File:

Ref:

Jackie Wepruk, General Manager  
National Farm Animal Care Council  
P.O. Box 5061  
Lacombe, Alberta T4L 1W7  
Email: nfacc@xplornet.com

Dear Ms. Wepruk and Council Members,

On behalf of the Province of British Columbia, staff at the Ministry of Agriculture, Food and Fisheries (AFF) have reviewed the proposed amendments to the 2013 farmed mink Code of Practice (the Code). We are hopeful this process will result in an evidence-based Code that will be acceptable by stakeholders and the general public.

Much like with other codes of practice that the National Farm Animal Care Council (NFACC) has developed, B.C. has considered how it will be reflected in our existing regulatory framework for animal protection. In B.C., the *Prevention of Cruelty to Animals Act* and the *Animal Care Code of Practice Regulation* (the Regulation) reference NFACC codes of practice in the Regulation, including the 2013 farmed mink Code. Given the significant pressure on the Ministry with respect to farmed mink in B.C., we would like to review the updated Code when available in order to examine how it may be reflected in current regulations.

In reviewing the proposed changes, we noted some additional areas of the Code and the review process that could be improved (please see the attached). It is critical the Code be clear, measurable, and continually improving to meet animal welfare needs and societal expectations. Provincial staff are following up with technical comments through the online portal.

.../2

We look forward to continuing to participate in the revision of this Code.

Sincerely,


---

**Ministry of Agriculture, Food  
and Fisheries**

Office of the Deputy Minister

Mailing Address:  
PO Box 9120 Stn Prov Govt  
Victoria BC V8W 9B4  
Telephone: 250 356-1800  
Facsimile: 250 356-8392

Location:  
5th floor, 545 Superior Street  
Victoria BC V8V 1T7  
Web Address: <http://gov.bc.ca/agri/>

A handwritten signature in black ink, appearing to read 'Tom Ethier'.

Tom Ethier  
Deputy Minister

cc: Timothy J. Kennedy

## RE: Mink Code

---

From: Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>  
To: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>, Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>  
Cc: Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>  
Sent: February 4, 2021 3:23:56 PM PST  
Received: February 4, 2021 3:23:57 PM PST

It's all good, Terri. I'm sure we'll have plenty of other opportunities for me to try to be more clear on this!  
Thanks very much. I am going to share the letter with Julie as she's helping me with the response for the Minister.  
Rayna

---

**From:** Giacomazzi, Terri AGRI:EX  
**Sent:** February 4, 2021 12:58 PM  
**To:** Gunvaldsen, Rayna AGRI:EX ; Anderson, Arlene AGRI:EX  
**Cc:** Viney, Ursula E AGRI:EX  
**Subject:** RE: Mink Code

Hello Rayna,

I'm out of the office today and I'm sorry, unfortunately I won't be able to set aside a time to share screens. If you wish, you could send me some additional language and I could incorporate. I'm going offline shortly but intend to submit the final comments tomorrow afternoon.

I agree with your comment re 'we' versus 'I'. I will change that.

From my perspective you can use some of that language. I borrowed some of it from the team providing comments on the salmonid code. What I wanted to portray was that the NFACC code process is a very important, thorough, and inclusive process that finds common ground among many stakeholders. But I also wanted to reiterate that the codes must be working toward continual improvement in animal welfare. I'm not sure if this came through well or not but that was my intention.

T.

---

**From:** Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>  
**Sent:** Thursday, February 4, 2021 11:37 AM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>; Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>  
**Cc:** Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>  
**Subject:** RE: Mink Code

Thank you. I feel like I'm not communicating well on what I would like and what is available for comment. If anyone had a minute I could share my screen and show you what is available, why I feel it's challenging, and see if there are any solutions.

Should we change the wording to be more 'we' vs. 'I' based?

As an aside, I have an e-approvals from the Minister regarding NFACC mink codes. Could I use similar language to the letter attached in your email from the DM?

Rayna

---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** February 3, 2021 4:50 PM  
**To:** Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>  
**Cc:** Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>; Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>  
**Subject:** Mink Code

As discussed, drafts for your review.

Please note, we have an extension from NFACC until next week Monday.

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag  
Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

Please note: I am currently working from home. If you do not reach me at the number listed above, please leave me a message and I will return your call as soon as I am able. Alternatively, please send me an email to arrange a suitable call back time. Thank you.

## FW: Mink Code

---

From: Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>  
To: Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>  
Sent: February 4, 2021 3:24:57 PM PST  
Received: February 4, 2021 3:24:58 PM PST  
Attachments: Ministry Response to Mink Code Review.docx, DM Response to NFACC on the Farmed Mink Code of Practice.docx

Julie, I wonder if some of the language in the DM response could help us in our response re: NFACC?

---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** February 3, 2021 4:50 PM  
**To:** Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>  
**Cc:** Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>; Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>  
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## RE: NFACC Contact Form

---

From: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
To: NFACC - Liz McConnell <liz@nfacc.ca>  
Cc: Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>, Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>, Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>, Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>  
Sent: February 6, 2021 9:09:49 PM PST  
Received: February 6, 2021 9:09:50 PM PST  
Attachments: image001.png, image002.png, Ministry Response to Mink Code Review.docx

Hello Liz,

I tried to use the link you provided below but it is no longer active. Attached you will find our comments. Thank you for the extension to provide comments.

Terri,

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag  
Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

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---

**From:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Sent:** Wednesday, February 3, 2021 6:38 AM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: NFACC Contact Form

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good morning Terri,

We will leave the survey open for you until first thing Monday morning.

I have sent you the link directly to the actual survey as I will be removing it from the NFACC website Friday morning.

When you complete the survey, and if you have time, please send me a quick email of notification.

<https://www.surveymonkey.com/r/K8GRMWB>

Thank you,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Sent:** February 2, 2021 12:44 PM  
**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>  
**Subject:** RE: NFACC Contact Form

Liz, would it be possible to get a small extension? We might be able to make the deadline but we might not also. We definitely want to provide a BC Ministry response and I'm doing the coordinating of that response. It is taking a little longer than expected.

Thank you for the consideration,  
Terri.

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>  
**Sent:** Wednesday, January 27, 2021 1:05 PM  
**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Subject:** RE: NFACC Contact Form

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Hello,

The table I shared with you is included in SurveyMonkey.

If you have any other questions please do not hesitate to ask.

Thank you!

Liz

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Sent:** January 27, 2021 2:01 PM  
**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>  
**Subject:** RE: NFACC Contact Form

Okay, thank you. So if I were to go into the survey monkey I would find the table you previously sent, correct?

Thank you! And I am so sorry about my long list of questions for you! 😊

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>  
**Sent:** Wednesday, January 27, 2021 12:56 PM  
**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>  
**Subject:** RE: NFACC Contact Form

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Hello,

That is correct; there is no other document.

Thank you,

Liz

---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** January 27, 2021 1:51 PM  
**To:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Subject:** RE: NFACC Contact Form

Thank you Liz. This is the current code, without proposed revisions, correct?

---

**From:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Sent:** Wednesday, January 27, 2021 12:46 PM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: NFACC Contact Form

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Hello Terri,

Below please find a link to the mink Code.

[https://www.nfacc.ca/pdfs/codes/mink\\_code\\_of\\_practice.pdf](https://www.nfacc.ca/pdfs/codes/mink_code_of_practice.pdf)

Regards,

Liz

---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** January 27, 2021 1:41 PM  
**To:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Subject:** RE: NFACC Contact Form

Thank you Liz. Yes, this is helpful. So, is there a pdf of the code available? When we coordinated our Ministry response on the salmonids code there was an online version of the draft code we could all access without having to go through the survey. That made the creation of a Ministry response a lot easier.

*Terri Giacomazzi, Senior Policy Analyst, BSc (Agr), M.A., P.Ag  
Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552*

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**Sent:** Wednesday, January 27, 2021 12:14 PM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: NFACC Contact Form

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Good afternoon Terri,

Would the attached document be of assistance?

Regards,



Liz McConnell

Email [liz@nfacc.ca](mailto:liz@nfacc.ca)

Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

From: Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

Sent: January 27, 2021 12:55 PM

To: [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

Subject: NFACC Contact Form

A form submission has been received from <https://www.nfacc.ca/contact-us>

NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

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Terri.

SEARCH PHRASE: (not provided)



## RE: NFACC Contact Form

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From: Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
To: NFACC - Liz McConnell  
Cc: Anderson, Arlene AFF:EX, Gunvaldsen, Rayna AFF:EX, Viney, Ursula E AFF:EX, Hughes, Marie Julie AFF:EX  
Sent: February 6, 2021 9:09:49 PM PST  
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Attachments: image001.png, image002.png, Ministry Response to Mink Code Review.docx

Hello Liz,

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Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

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**Subject:** RE: NFACC Contact Form

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Liz

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**Subject:** RE: NFACC Contact Form

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**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>

**Subject:** RE: NFACC Contact Form

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello Terri,

Below please find a link to the mink Code.

[https://www.nfacc.ca/pdfs/codes/mink\\_code\\_of\\_practice.pdf](https://www.nfacc.ca/pdfs/codes/mink_code_of_practice.pdf)

Regards,

Liz

---

**From:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>

**Sent:** January 27, 2021 1:41 PM

**To:** NFACC - Liz McConnell <liz@nfacc.ca>

**Subject:** RE: NFACC Contact Form

Thank you Liz. Yes, this is helpful. So, is there a pdf of the code available? When we coordinated our Ministry response on the salmonids code there was an online version of the draft code we could all access without having to go through the survey. That made the creation of a Ministry response a lot easier.

*Terri Giacomazzi, Senior Policy Analyst, BSc (Agr), M.A., P.Ag  
Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552*

*Please note: I am currently working from home. If you do not reach me at the number listed above, please leave me a message and I will return your call as soon as I am able. Alternatively, please send me an email to arrange a suitable call back time. Thank you.*

---

**From:** NFACC - Liz McConnell <liz@nfacc.ca>

**Sent:** Wednesday, January 27, 2021 12:14 PM

**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>

**Subject:** RE: NFACC Contact Form

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Good afternoon Terri,

Would the attached document be of assistance?

Regards,



Liz McConnell

Email [liz@nfacc.ca](mailto:liz@nfacc.ca)

Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

From: Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

Sent: January 27, 2021 12:55 PM

To: [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

Subject: NFACC Contact Form

A form submission has been received from <https://www.nfacc.ca/contact-us>

NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

MESSAGE: Hello all,

Would it be possible to access a pdf of the proposed mink code without doing the survey? We plan to provide a single BC Ministry response and have a few staff who would like to review but I don't see the proposed code on your website other than taking the survey...? If it is there could you please direct me to where it is located? Thank you!  
Terri.

SEARCH PHRASE: (not provided)

**NFACC Code of Practice for the Care and Handling of Farmed Mink**  
**BC Ministry of Agriculture-Comments 2021**

General Feedback:

- Provincial government review of codes typically includes staff from policy, operations and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and is internally approved by Executive. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide general comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

**Section 1.2.2**

Pens:

This is a difficult situation that leaves us conflicted. If in 2013 it was determined that mink cage sizes needed to increase to optimize welfare, it is hard to accept walking back on this requirement even though profit margins over the past 10 years have considerably decreased.

We encourage further research on mink housing and, especially, enrichment, however if there is less money in the industry, I wonder who will be funding this. What about a trade-off between enrichment and pen size? If pen size can't practicably be increased, could enrichment be improved? It wasn't clear that a table tennis ball was enough for the life of the animal.

**Section 1.2.3**

Nest boxes:

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements.

**Section 3.1**

Nutrition:

We appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

**Section 3.1.1**

Breeding Mink:

Is selection of breeders efficient prior to furring? Overall, we agree with the requirements and recommendations. The mink producers we have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: We do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

## **Section 5.1**

Animal Handling:

It isn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

## **Section 6.1**

Euthanasia methods:

The literature seems to indicate very specific equipment for using CO from combustion. This is not clear in the suggested edits and seems to recommend CO from combustion engines. We don't think this is appropriate both from a humane killing point of view, or human safety. It is also not clear that CO<sub>2</sub> is best practise considering its aversive nature to mammals and especially semi-aquatic mammals. The literature recommends 100% CO<sub>2</sub>, which is difficult to achieve and even then, causes extended time to death and loss of consciousness. Humane killing recommendations have been moving further away from the use of CO<sub>2</sub> in mammalian species for these reasons in general. We would sincerely hope better methods are on the horizon. Has there been any work on methods such as non-penetrating captive bolt in this species? There should also be a distinction between euthanasia (to prevent suffering from illness, disease, injury); humane killing (for harvest purposes); and depopulation (rapid killing for disease control). Methods of killing may have different requirements for all these purposes and the distinction is not clear as to what we're talking about in this document, and the reason for needing to use a less than humane method. Is there often shortages of CO during harvest, or in general?

In relation to:

Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

We realize there may be information in the preamble, however, appropriate wording such as "CO<sub>2</sub> from a compressed cylinder may be used for euthanizing mink on farm in the absence of CO." We think it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

## **Section 6.2**

Evidence to Confirm Death:

In relation to:

“The requirement was amended to clarify the two indicators that must be checked to confirm death.” “Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes.”

Which are the two indicators of the previously recommended five that are now acceptable?

## RE: NFACC Contact Form

From: NFACC - Liz McConnell <liz@nfacc.ca>  
To: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
Cc: Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>, Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>, Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>, Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>  
Sent: February 7, 2021 1:07:52 PM PST  
Received: February 7, 2021 1:08:20 PM PST  
Attachments: image003.png, image004.png, image005.png

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good afternoon Terri,  
Thank you for your response.  
I have included it in the summary data.  
Regards,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

### National Farm Animal Care Council of Canada (NFACC)

**From:** Giacomazzi, Terri AGRI:EX  
**Sent:** February 6, 2021 10:10 PM  
**To:** NFACC - Liz McConnell  
**Cc:** Anderson, Arlene AGRI:EX ; Gunvaldsen, Rayna AGRI:EX ; Viney, Ursula E AGRI:EX ; Hughes, Marie Julie AGRI:EX  
**Subject:** RE: NFACC Contact Form

Hello Liz,  
I tried to use the link you provided below but it is no longer active. Attached you will find our comments. Thank you for the extension to provide comments.  
Terri,

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag

Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

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**From:** NFACC - Liz McConnell <liz@nfacc.ca>  
**Sent:** Wednesday, February 3, 2021 6:38 AM  
**To:** Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: NFACC Contact Form

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I have sent you the link directly to the actual survey as I will be removing it from the NFACC website Friday morning.  
When you complete the survey, and if you have time, please send me a quick email of notification.

<https://www.surveymonkey.com/r/K8GRMWB>

Thank you,



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Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)



**National Farm Animal Care Council of Canada (NFACC)**

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** February 2, 2021 12:44 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

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Thank you for the consideration,

Terri.

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**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 1:05 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

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If you have any other questions please do not hesitate to ask.

Thank you!

Liz

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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 2:01 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Okay, thank you. So if I were to go into the survey monkey I would find the table you previously sent, correct?

Thank you! And I am so sorry about my long list of questions for you! 😊

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 12:56 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

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Hello,

That is correct; there is no other document.

Thank you,

Liz

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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 1:51 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Thank you Liz. This is the current code, without proposed revisions, correct?

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 12:46 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

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Regards,

Liz

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Good afternoon Terri,

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Regards,



Liz McConnell

Email [liz@nfacc.ca](mailto:liz@nfacc.ca)

Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

**From:** Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 12:55 PM

**To:** [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

**Subject:** NFACC Contact Form

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NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

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Terri.

SEARCH PHRASE: (not provided)

SEARCH PHRASE: (not provided)

## RE: NFACC Contact Form

---

From: Shew, Hanna AGRI:EX <Hanna.Shew@gov.bc.ca>  
To: Giacomazzi, Terri AGRI:EX <Terri.Giacomazzi@gov.bc.ca>, Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>  
Sent: February 8, 2021 12:04:09 PM PST  
Received: February 8, 2021 12:05:20 PM PST  
Attachments: image001.png, image002.png

Hi Terri,

I've added the below email and the letter attached to it to CLIFF 193863 (eapp 2350) and assigned eapp to you.

Arlene is your colleague in eApprovals so has editing ability to it.

I've also removed the DM's e-signature from the letter since the letter itself has not been approved yet, and because we, at a branch level, are not authorized to apply ADM's or DM's e-signature to correspondence or any other documents.

Cheers,

Hanna

---

**From:** Giacomazzi, Terri AGRI:EX  
**Sent:** February 6, 2021 9:15 PM  
**To:** Anderson, Arlene AGRI:EX  
**Cc:** Shew, Hanna AGRI:EX  
**Subject:** RE: NFACC Contact Form

Hi Arlene,

I assume we should still have the DM signed cover letter approved and sent, perhaps with the comments sent below. I will not be accessing email this coming week so I am attaching it here.

Hanna, this letter still needs the ref and file number before moving it for approval. Will touch base the week after next.

Thanks,

T.

---

**From:** Giacomazzi, Terri AGRI:EX  
**Sent:** Saturday, February 6, 2021 9:10 PM  
**To:** 'NFACC - Liz McConnell' <liz@nfacc.ca>  
**Cc:** Anderson, Arlene AGRI:EX <Arlene.Anderson@gov.bc.ca>; Gunvaldsen, Rayna AGRI:EX <Rayna.Gunvaldsen@gov.bc.ca>; Viney, Ursula E AGRI:EX <Ursula.Viney@gov.bc.ca>; Hughes, Marie Julie AGRI:EX <MarieJulie.Hughes@gov.bc.ca>  
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## National Farm Animal Care Council of Canada (NFACC)

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## National Farm Animal Care Council of Canada (NFACC)

-----Original Message-----

**From:** Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 12:55 PM

**To:** [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

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Terri.

SEARCH PHRASE: (not provided)

## RE: NFACC Review Process for AFF

---

From: Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
To: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
Sent: February 24, 2021 1:45:13 PM PST  
Received: February 24, 2021 1:45:14 PM PST

Sure. This topic came up yesterday on our fed prov animal welfare call. NFACC strongly prefers individual, technical feedback on the codes. I'll have a discussion with David Truss (Agriculture Canada) who chairs our calls to share our views with him and see if we can come up with a potentially different approach. I'll also discuss with Rayna since she mentioned she would like to be involved and she was also on yesterday's call.

I wonder if there is a way for provinces to provide general code feedback in a different format.

Terri.

---

**From:** Anderson, Arlene AFF:EX  
**Sent:** Wednesday, February 24, 2021 12:26 PM  
**To:** Giacomazzi, Terri AFF:EX  
**Subject:** NFACC Review Process for AFF

Hi Terri,

Can you turn your mind to how AFF should address NFACC code reviews or code development? We need an accepted AFF approach but I don't think policy necessarily needs to do it all or always lead it.

A

**Arlene Anderson** | Director, Policy and Legislation  
Corporate Policy and Priorities Branch | Ministry of Agriculture, Food and Fisheries  
778 698-5170 | [Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)

## 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review

---

From: Ethier, Tom AFF:EX s.15  
s.15  
To: 'nfacc@xplornet.com'  
Sent: March 5, 2021 4:20:42 PM PST  
Received: March 5, 2021 4:20:43 PM PST  
Attachments: 193863 AFF Response to Mink Code Review.pdf, 193863 DM Response to NFACC on the Farmed Mink Code of Practice.pdf

Good afternoon,

Please see the attached letter and Ministry responses for your consideration.

Regards,

**Tom Ethier**  
Deputy Minister  
Ministry of Agriculture, Food and Fisheries



**NFACC Code of Practice for the Care and Handling of Farmed Mink  
B.C. Ministry of Agriculture, Food and Fisheries-Comments 2021**

General Feedback:

- Provincial government review of codes typically includes staff from policy, operations, and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and results in a consolidated B.C. submission. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide general comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

**Section 1.2.2**

**Pens:**

In 2013 it was determined that mink cage sizes needed to increase to optimize welfare. Decreased profit margins over the past 10 years should not be informing the changes to the code, as the economics of this industry are separate from ensuring optimal animal welfare conditions.

We encourage further research on mink housing and, especially, enrichment. It wasn't clear that a table tennis ball was enough enrichment for the life of the animal; additional enrichment options should be seriously explored and implemented.

**Section 1.2.3**

**Nest boxes:**

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements. Reducing the requirements for this component is not clear and not supported by B.C.

**Section 3.1**

**Nutrition:**

We appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

February 23, 2021

### **Section 3.1.1**

Breeding Mink:

Is selection of breeders efficient prior to furring? Overall, we agree with the requirements and recommendations. The mink producers we have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: We do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

### **Section 5.1**

Animal Handling:

It isn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

### **Section 6.1**

Euthanasia methods:

The literature seems to indicate very specific equipment for using CO from combustion. This is not clear in the suggested edits and seems to recommend CO from combustion engines. B.C. does not see this is appropriate both from a humane killing point of view, or human safety. It is also not clear that CO<sub>2</sub> is best practice considering its aversive nature to mammals and especially semi-aquatic mammals. The literature recommends 100% CO<sub>2</sub>, which is difficult to achieve and even then, causes extended time to death and loss of consciousness. Humane killing recommendations have been moving further away from the use of CO<sub>2</sub> in mammalian species for these reasons in general. B.C. would like to see better methods on the horizon. Has there been any work on methods such as non-penetrating captive bolt in this species? There should also be a distinction between euthanasia (to prevent suffering from illness, disease, injury); humane killing (for harvest purposes); and depopulation (rapid killing for disease control).

In relation to:

Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

We realize there may be information in the preamble, however, appropriate wording such as "CO<sub>2</sub> from a compressed cylinder may be used for euthanizing mink on farm in the absence of CO." B.C. supports that it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

### **Section 6.2**

Evidence to Confirm Death:

In relation to:

"The requirement was amended to clarify the two indicators that must be checked to confirm death." "Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes."

Which are the two indicators of the previously recommended five that are now acceptable?



March 5, 2021

File: 0280-30  
Ref: 193863

Jackie Wepruk, General Manager  
National Farm Animal Care Council  
P.O. Box 5061  
Lacombe, Alberta T4L 1W7  
Email: [nfacc@xplornet.com](mailto:nfacc@xplornet.com)

Dear Ms. Wepruk and Council Members,

On behalf of the Province of British Columbia, staff at the Ministry of Agriculture, Food and Fisheries (AFF) have reviewed the proposed amendments to the 2013 farmed mink Code of Practice (the Code). We are hopeful this process will result in an evidence-based Code that will be acceptable by stakeholders and the general public.

Much like with other codes of practice that the National Farm Animal Care Council (NFACC) has developed, B.C. has considered how it will be reflected in our existing regulatory framework for animal protection. In B.C., the *Prevention of Cruelty to Animals Act* and the *Animal Care Code of Practice Regulation* (the Regulation) reference NFACC codes of practice in the Regulation, including the 2013 farmed mink Code. Given the significant pressure on the Ministry with respect to farmed mink in B.C., we would like to review the updated Code when available in order to examine how it may be reflected in current regulations.

In reviewing the proposed changes, we noted some additional areas of the Code and the review process that could be improved (please see the attached). It is critical the Code be clear, measurable, and continually improving to meet animal welfare needs and societal expectations. Provincial staff are following up with technical comments through the online portal.

We look forward to continuing to participate in the revision of this Code.

Sincerely,

Tom Ethier  
Deputy Minister

## RE: NFACC Contact Form

From: Caroline Ramsay <ramsayc@telus.net>  
To: Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>, nfacc@xplornet.com  
Sent: March 10, 2021 5:58:51 PM PST  
Received: March 10, 2021 5:58:57 PM PST  
Attachments: image001.png, image002.png

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Yes, it was great connecting with you both. A very helpful conversation on many fronts!  
Very best,  
Caroline

---

**From:** Giacomazzi, Terri AFF:EX  
**Sent:** March 10, 2021 11:11 AM  
**To:** nfacc@xplornet.com  
**Cc:** 'Caroline Ramsay'  
**Subject:** RE: NFACC Contact Form

Thanks, you too. It was so great to catch up with you two! Take care and keep in touch!  
T.

---

**From:** nfacc@xplornet.com <nfacc@xplornet.com>  
**Sent:** Wednesday, March 10, 2021 11:08 AM  
**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Cc:** 'Caroline Ramsay' <ramsayc@telus.net>  
**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Great! Thanks for the input. While I hope we don't do another Code amendment any time soon, a lesson has been learned that we can apply to a next time whenever that may be.  
Have a good rest of your week Terri.  
Jackie

---

**From:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** March 10, 2021 12:02 PM  
**To:** nfacc@xplornet.com  
**Cc:** Caroline Ramsay <ramsayc@telus.net>  
**Subject:** RE: NFACC Contact Form

Oh my. Yes, it would have definitely helped to have this. Sure, putting it on the website would ensure better access as well. Thank you for your patience with all of this too!

---

**From:** nfacc@xplornet.com <nfacc@xplornet.com>  
**Sent:** Wednesday, March 10, 2021 10:53 AM  
**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Cc:** Caroline Ramsay <ramsayc@telus.net>  
**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Terri,  
Thanks for the background and context for where we may have gone wrong. I think Liz misunderstood at the outset what you were looking for given that we didn't have a PDF of the proposed amendments. She provided what we had available but the chart was not intended to serve as the basis for developing feedback on the amendments. Attached is what Caroline and I had put together and sent to David. I am now wondering (and perhaps you can tell us Terri) if we had made this PDF available from the website, would that have helped?

Thanks for your understanding on all of this!

Regards,

Jackie

---

**From:** Giacomazzi, Terri AFF:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** March 10, 2021 11:23 AM

**To:** NFACC <[nfacc@xplornet.com](mailto:nfacc@xplornet.com)>

**Subject:** FW: NFACC Contact Form

Here you go....

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Sunday, February 7, 2021 1:08 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Cc:** Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>; Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>; Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>; Hughes, Marie Julie AGRI:EX <[MarieJulie.Hughes@gov.bc.ca](mailto:MarieJulie.Hughes@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Good afternoon Terri,

Thank you for your response.

I have included it in the summary data.

Regards,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

---

**National Farm Animal Care Council of Canada (NFACC)**

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**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** February 6, 2021 10:10 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Cc:** Anderson, Arlene AGRI:EX <[Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)>; Gunvaldsen, Rayna AGRI:EX <[Rayna.Gunvaldsen@gov.bc.ca](mailto:Rayna.Gunvaldsen@gov.bc.ca)>; Viney, Ursula E AGRI:EX <[Ursula.Viney@gov.bc.ca](mailto:Ursula.Viney@gov.bc.ca)>; Hughes, Marie Julie AGRI:EX <[MarieJulie.Hughes@gov.bc.ca](mailto:MarieJulie.Hughes@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

Hello Liz,

I tried to use the link you provided below but it is no longer active. Attached you will find our comments. Thank you for the extension to provide comments.

Terri,

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag

Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries

1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

Please note: I am currently working from home. If you do not reach me at the number listed above, please leave me a message and I will return your call as soon as I am able. Alternatively, please send me an email to arrange a suitable call back time. Thank you.

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, February 3, 2021 6:38 AM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Good morning Terri,

We will leave the survey open for you until first thing Monday morning.

I have sent you the link directly to the actual survey as I will be removing it from the NFACC website Friday morning.

When you complete the survey, and if you have time, please send me a quick email of notification.

<https://www.surveymonkey.com/r/K8GRMWB>

Thank you,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

---

**National Farm Animal Care Council of Canada (NFACC)**

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** February 2, 2021 12:44 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Liz, would it be possible to get a small extension? We might be able to make the deadline but we might not also. We definitely want to provide a BC Ministry response and I'm doing the coordinating of that response. It is taking a little longer than expected.

Thank you for the consideration,  
Terri.

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 1:05 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hello,  
The table I shared with you is included in SurveyMonkey.  
If you have any other questions please do not hesitate to ask.  
Thank you!  
Liz

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 2:01 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Okay, thank you. So if I were to go into the survey monkey I would find the table you previously sent, correct?

Thank you! And I am so sorry about my long list of questions for you! 😊

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 12:56 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hello,  
That is correct; there is no other document.  
Thank you,  
Liz

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 1:51 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Thank you Liz. This is the current code, without proposed revisions, correct?

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 12:46 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hello Terri,

Below please find a link to the mink Code.

[https://www.nfacc.ca/pdfs/codes/mink\\_code\\_of\\_practice.pdf](https://www.nfacc.ca/pdfs/codes/mink_code_of_practice.pdf)

Regards,  
Liz

---

**From:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 1:41 PM

**To:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Subject:** RE: NFACC Contact Form

Thank you Liz. Yes, this is helpful. So, is there a pdf of the code available? When we coordinated our Ministry response on the salmonids code there was an online version of the draft code we could all access without having to go through the survey. That made the creation of a Ministry response a lot easier.

**Terri Giacomazzi**, Senior Policy Analyst, BSc (Agr), M.A., P.Ag

Corporate Governance, Policy and Legislation Branch | BC Ministry of Agriculture, Food and Fisheries  
1767 Angus Campbell Road | Abbotsford, BC | V3G 2M3 | 1 (778) 666-0552

Please note: I am currently working from home. If you do not reach me at the number listed above, please leave me a message and I will return your call as soon as I am able. Alternatively, please send me an email to arrange a suitable call back time. Thank you.

---

**From:** NFACC - Liz McConnell <[liz@nfacc.ca](mailto:liz@nfacc.ca)>

**Sent:** Wednesday, January 27, 2021 12:14 PM

**To:** Giacomazzi, Terri AGRI:EX <[Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)>

**Subject:** RE: NFACC Contact Form

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Good afternoon Terri,  
Would the attached document be of assistance?  
Regards,



Liz McConnell  
Email [liz@nfacc.ca](mailto:liz@nfacc.ca)  
Web [www.nfacc.ca](http://www.nfacc.ca)

**National Farm Animal Care Council of Canada (NFACC)**

-----Original Message-----

**From:** Terri Giacomazzi <[terri.giacomazzi@gov.bc.ca](mailto:terri.giacomazzi@gov.bc.ca)>

**Sent:** January 27, 2021 12:55 PM

**To:** [nfacc@nfacc.ca](mailto:nfacc@nfacc.ca)

**Subject:** NFACC Contact Form

A form submission has been received from <https://www.nfacc.ca/contact-us>

NAME: Terri Giacomazzi

EMAIL: [Terri.Giacomazzi@gov.bc.ca](mailto:Terri.Giacomazzi@gov.bc.ca)

MESSAGE: Hello all,

Would it be possible to access a pdf of the proposed mink code without doing the survey? We plan to provide a single BC Ministry response and have a few staff who would like to review but I don't see the proposed code on your website other than taking the survey...? If it is there could you please direct me to where it is located? Thank you!  
Terri.

SEARCH PHRASE: (not provided)

## RE: availability for a chat this week

---

From: nfacc@xplornet.com  
To: Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>, Arlene.Anderson@gov.bc.ca, Anderson, Arlene AFF:EX  
Cc: Caroline Ramsay <ramsayc@telus.net>  
Sent: March 12, 2021 9:53:10 AM PST  
Received: March 12, 2021 9:53:16 AM PST

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello Arlene and Terri,

Thank you for the helpful discussion on Wednesday. I am so sorry that there was so much confusion over the mink Code amendment public comment period. More lessons learned for sure! I will be briefing NFACC's Executive and a response to the Deputy Minister's letter will follow. However, in the meantime...

I had mentioned that the Ministry could assign additional contact points for receiving NFACC Information Updates to ensure that it is well aware of any developments and able to respond as needed. The access point for signing up for NFACC Information Updates is at: <https://www.nfacc.ca/newsletters>. Once signed up, the individual will receive all news releases and (approximately) quarterly updates on all things NFACC (e.g., Code development and amendment status, public comment period announcements).

I hope this starts to build a better communication bridge between us. Never hesitate to reach out if you have any questions or concerns.

Best regards,

Jackie

Jackie Wepruk

NFACC General Manager

(T) 403.783.4066

[nfacc@xplornet.com](mailto:nfacc@xplornet.com)

[www.nfacc.ca](http://www.nfacc.ca)

---

**From:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>

**Sent:** March 9, 2021 11:25 AM

**To:** [nfacc@xplornet.com](mailto:nfacc@xplornet.com)

**Cc:** 'Caroline Ramsay' <ramsayc@telus.net>

**Subject:** RE: availability for a chat this week

Hi Jackie,

I had a brief chat with our Policy and Legislation Director this morning. This is such a sensitive file for us right now and she would like to be included in our discussion tomorrow. Would you be able to send her the invite, or shall I forward? Here is her email: [Arlene.Anderson@gov.bc.ca](mailto:Arlene.Anderson@gov.bc.ca)

Thank you,

Terri.

---

**From:** [nfacc@xplornet.com](mailto:nfacc@xplornet.com) <[nfacc@xplornet.com](mailto:nfacc@xplornet.com)>

**Sent:** Monday, March 8, 2021 12:28 PM

**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>

**Cc:** 'Caroline Ramsay' <ramsayc@telus.net>

**Subject:** RE: availability for a chat this week

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hi Terri,

Thanks so much for the quick response and apologies for my own delay in responding.

I think it would be best to have an more informal discussion with you first. This Wednesday works for Caroline and me. I'll set up a calendar invite with virtual meeting details/link.

Thanks again!

Jackie



---

**From:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>

**Sent:** March 8, 2021 11:19 AM

**To:** nfacc@xplornet.com

**Cc:** Caroline Ramsay <ramsayc@telus.net>

**Subject:** RE: availability for a chat this week

Ah, thank you Jackie for reaching out to me directly. 😊 It's nice to hear from you!

There is interest/concern here about how the province can effectively contribute to the code development and/or review processes and I know our Chief Vet, and possibly our Policy and Legislation Director, would also like to be part of the discussion. However, their time is really tight right now and I think they were hoping to have a conversation on this next month. Depending on your schedule, perhaps we could either try to arrange something with this 5 of us in the coming weeks? I think that would be the best approach, but if you need feedback sooner, sure I could meet with you this coming Wednesday morning sometime between 9 and 10 PST just to start the conversation and provide some clarity on the letter.

Terri.

---

**From:** nfacc@xplornet.com <nfacc@xplornet.com>

**Sent:** Monday, March 8, 2021 9:16 AM

**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>

**Cc:** Caroline Ramsay <ramsayc@telus.net>

**Subject:** availability for a chat this week

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Terri,

I hope all is well with you. We're feeling like spring is in the air in Alberta, but that probably means a snowstorm for May long weekend.

Would you be available for a quick chat this week with me and Caroline? I believe you were heading up the Ministry's submission on the mink Code amendment, and since we know and love you, thought we'd like to touch base with you first. 😊 I received a letter from Tom Ethier and, before taking next steps and responding, would like to get a bit of context and clarity on a few points.

The letter is providing input that should have come through the public comment period, which closed February 4<sup>th</sup>. It's also addressed to me and Council members, not the Code amendment committee. NFACC does not insert itself into the details of a Code's amendment or development so that's a bit of an issue. The Code amendment committee is already considering the feedback received, which does include feedback from the Ministry, albeit with a different tone. There also seems to be a possible request to see the draft Code in advance of its public release. This would not be possible, but perhaps we're mistaken in the intent.

A conversation would be super helpful to assist me in conveying the intent to NFACC's Executive (a first step before anything goes to the full NFACC board) and for Caroline to frame any communications to the Code amendment committee.

As of today, I am available:

Tuesday – before 4 PM MST/3PM PST

Wednesday – any time

Thursday - before 11AM MST/10 AM PST

Friday – any time

Thanks and we look forward to chatting!

Best regards,

Jackie

## RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review

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From: nfacc@xplornet.com  
To: Ethier, Tom AFF:EX <Tom.Ethier@gov.bc.ca>  
Sent: March 24, 2021 11:09:02 AM PDT  
Received: March 24, 2021 11:09:15 AM PDT  
Attachments: NFACC to BC MAFF 03-24-2021.pdf

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello Mr. Ethier,  
Thank you for your letter and Ministry responses. Attached is a follow up.  
Best regards,  
Jackie  
Jackie Wepruk  
NFACC General Manager  
(T) 403.783.4066  
[nfacc@xplornet.com](mailto:nfacc@xplornet.com)  
[www.nfacc.ca](http://www.nfacc.ca)

---

**From:** Evers, Charlene AFF:EX **On Behalf Of** Ethier, Tom AFF:EX  
**Sent:** March 5, 2021 5:21 PM  
**To:** 'nfacc@xplornet.com'  
**Subject:** 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Good afternoon,  
Please see the attached letter and Ministry responses for your consideration.  
Regards,  
**Tom Ethier**  
Deputy Minister  
Ministry of Agriculture, Food and Fisheries



**NATIONAL FARM ANIMAL CARE COUNCIL  
CONSEIL NATIONAL POUR LES SOINS AUX ANIMAUX D'ÉLEVAGE**

March 24, 2021

Mr. Tom Ethier, Deputy Minister  
Ministry of Agriculture, Food and Fisheries  
PO Box 9120 Stn Prov Govt  
Victoria, BC, V8W 9B4

Email: [Tom.Ethier@gov.bc.ca](mailto:Tom.Ethier@gov.bc.ca)

RE: File 0280-30, Ref 193863

Dear Mr. Ethier,

Thank you for your correspondence on the proposed amendments to the 2013 farmed mink Code of Practice (the Code) and for identifying some areas of concern relative to the public comment period and the proposed amendments. We are aware of the considerable pressure being placed on the Ministry with respect to farmed mink in B.C.

Ministry feedback on the mink Code amendments is consistent with the on-line submission provided by Ministry staff and is in the hands of the mink Code amendment committee for their further consideration. However, we will ensure that the mink Code amendment committee is aware of your letter and the additional input provided.

Caroline Ramsay (mink Code amendment manager) and I had a very productive conversation with Arlene Anderson, Manager, Policy and Legislation, and Terri Giacomazzi, Senior Policy Analyst, which helped us to understand some of the issues experienced during this public comment period. Code amendments are a new addition to the Code of Practice process, hence the feedback received from Arlene and Terri will help us to improve.

In addition, those in the Ministry needing to stay informed of NFACC's activities, including future Code public comment periods, can sign up at <https://www.nfacc.ca/newsletters> to receive news releases and quarterly NFACC Information Updates. This should ensure that the Ministry is receiving all notices of interest and can respond accordingly. This is also the channel by which the Ministry can be directly advised of when the amended version of the mink Code is finalized and publicly available. Our current projection is that the Code will be finalized by the summer of 2021.

Given the increasing public pressure with respect to farmed animal welfare on provincial governments and the need for Codes to demonstrate continual improvement, I would invite a conversation on how the BC Ministry could engage more directly at NFACC. NFACC is a made-in-Canada example of how diverse communities can arrive at consensus on socially important issues. Provincial government engagement on NFACC is valued and desired.

I look forward to continuing this discussion. Thank you again for your input on the mink Code amendments and the process by which those amendments are undertaken.

Best regards,

A handwritten signature in black ink, reading "Jackie Wepruk". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jackie Wepruk  
NFACC General Manager

## FW: NFACC

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From: Anderson, Arlene AFF:EX s.15  
s.15  
-ANDERSON, ARLENE>  
To: Todosichuk, Ardice AFF:EX  
Sent: March 29, 2021 8:42:12 AM PDT  
Received: March 29, 2021 8:42:12 AM PDT  
Attachments: NFACC to BC MAFF 03-24-2021.pdf

Hi Ardice,  
Hanna and myself are unable to open the attachment. Are you able to obtain another electronic copy?  
Thanks,  
Arlene

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**From:** Todosichuk, Ardice AFF:EX <[Ardice.Todosichuk@gov.bc.ca](mailto:Ardice.Todosichuk@gov.bc.ca)>

**Sent:** March 24, 2021 1:57 PM

**To:** Anderson, Arlene AFF:EX <[Arlene.Andeson@gov.bc.ca](mailto:Arlene.Andeson@gov.bc.ca)>

**Subject:** NFACC

Hi Arlene

I have a meeting with Tom and Jennifer on April 1<sup>st</sup> to discuss this letter and next steps. Could you provide me with some background in advance.

Thanks.

A

Ardice Todosichuk  
A/Executive Director  
Corporate Policy & Priorities Branch  
Ministry of Agriculture, Food and Fisheries

## 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review

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From: Anderson, Arlene AFF:EX s.15  
s.15  
-ANDERSON, ARLENE>  
To: Todosichuk, Ardice AFF:EX  
Sent: March 31, 2021 8:48:38 AM PDT  
Received: March 31, 2021 8:48:38 AM PDT  
Attachments: National Farm Animal Care Council and the Codes of Practice for the Care and Handling of Farm Animals.docx

Hi Ardice,

The note was sent to Rayna last night for comment but she hasn't been able to respond back yet.

Hope this helps.

A

## **National Farm Animal Care Council & Codes of Practice for the Care and Handling of Farm Animals**

Last Updated: March 30, 2021

### **Who is the National Farm Animal Care Council (NFACC)?**

NFACC is a collaborative partnership of Canadian farmed animal stakeholders including industry associations, the Federal Government, enforcement agencies, animal care and welfare bodies, and provincial ministries across the country. NFACC coordinates and leads the Code development and review processes in Canada. The NFACC Codes of Practices serve as our national understanding of farmed animal care requirements and recommended practices. Developed through broad representation and expertise on each Code Development Committee, the Codes are recognized for their collaborative approach, high quality, strong stakeholder commitment, and their inclusion of current scientific research. In comparison to other regions around the world, Canada is seen as a global leader in the development of national farmed animal welfare standards.

### **B.C. Legislation**

B.C.'s Animal Care Codes of Practice Regulation (the Regulation) came into force on June 1, 2019, under the *Prevention of Cruelty to Animals Act* (PCA Act) to provide further protection for farm animals by establishing reasonable and generally accepted practices of animal management. The Regulation references the NFACC Codes of Practice for farm animals as reasonable and generally accepted practices of animal management. Therefore, the NFACC codes are an important component of farmed animal protection in B.C. (For more information see "Protecting Farm Animal Welfare in British Columbia- FAQs": <https://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/animals-and-crops/animal-welfare/14330> )

### **Provincial Representation at NFACC**

The current option for provincial involvement in NFACC is through the NFACC board – currently there is one seat for provincial governments which is coordinated by the Federal Provincial Animal Welfare Group (FPAW) with the current provincial representative being from Ontario. Provincial engagement on FPAW is a mechanism for provincial input to the NFACC board. B.C. has typically had two staff participate in FPAW for many years- the Chief Veterinary Officer, and a Senior Policy Analyst. Other options for provincial participation in NFACC's processes are:

- Representation on a Code development or amendment committee
- Via the public comment period when a Code is released for public comment

### **Current Challenges of the NFACC Code Development and Review Process- B.C. Perspective**

- NFACC seeks technical expertise via the code development and review processes; there is not a formal mechanism for a coordinated provincial response and feedback.
  - This causes confusion among AFF staff whether they are responding as individual technical experts, or as provincial government representatives.
  - This also warrants discussion around the value and need for an overall, single "provincial response" as part of the Code process (versus individual response only).
  - If a coordinated provincial response is desirable from a BC perspective, it is necessary to determine who should lead and coordinate.
- The provincial rep has often been from Ontario since in-person meetings of NFACC in Ottawa are more easily attended by an Ontario rep; this structure limits B.C. engagement in NFACC

## **National Farm Animal Care Council &**

### **Codes of Practice for the Care and Handling of Farm Animals**

- BC SPCA is currently a member of NFACC (as a member of a coalition of provincial SPCAs, although they are currently the only member in that category) and has played a significant role participating in the development of NFACC Codes.
  - However, given the BCSPCA's advocacy against certain farmed animal industries (e.g. fur farming), the NFACC Board is considering whether they should remain on the Board.
  - This creates a difficult political situation for NFACC which is causing them to seek new provincial regulatory members.

s.13



## **RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review**

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From: Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
To: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
Sent: March 31, 2021 8:59:06 AM PDT  
Received: March 31, 2021 8:59:07 AM PDT

Perfect. Thanks Arlene.

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**From:** Anderson, Arlene AFF:EX  
**Sent:** Wednesday, March 31, 2021 8:58 AM  
**To:** Giacomazzi, Terri AFF:EX  
**Subject:** RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
I sent to Ardice and advised that Rayna had not been able to review it yet.

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**From:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** March 31, 2021 8:56 AM  
**To:** Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
**Subject:** RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
I sent an IM to Rayna letting her know I have sent it already because of the meeting change and for her to let us know as soon as she is able if there is anything erroneous. I know she did want to review it.  
T.

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**From:** Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
**Sent:** Wednesday, March 31, 2021 8:45 AM  
**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Thanks Terri. Much appreciated.

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**From:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Sent:** March 31, 2021 8:45 AM  
**To:** Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
**Subject:** RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Here you go. It hasn't been reviewed by anyone else but some text re provincial options was provided by NFACC.  
s.15

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**From:** Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
**Sent:** Monday, March 29, 2021 9:32 AM  
**To:** Giacomazzi, Terri AFF:EX <Terri.Giacomazzi@gov.bc.ca>  
**Subject:** FW: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Hi Terri,  
Could you provide a one-page background on the NFACC codes and our discussion with it this month? Ardice has a meeting with Tom on April 1, so if you could provide something to me by Wednesday that would be great.  
Thanks,  
A

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**From:** Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>  
**Sent:** March 29, 2021 8:57 AM  
**To:** Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>  
**Subject:** FW: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
FYI

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**From:** McGuire, Jennifer AFF:EX <Jennifer.Mcguire@gov.bc.ca>  
**Sent:** March 24, 2021 1:23 PM  
**To:** Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>  
**Cc:** Evers, Charlene AFF:EX <Charlene.Evers@gov.bc.ca>; Norton, Chris AFF:EX <Chris.Norton@gov.bc.ca>  
**Subject:** FW: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Hi,  
Lets schedule a call to discuss this and the next steps. Next week is fine.  
Thanks  
JLM

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**From:** Ethier, Tom AFF:EX <[Tom.Ethier@gov.bc.ca](mailto:Tom.Ethier@gov.bc.ca)>  
**Sent:** March 24, 2021 12:12 PM  
**To:** McGuire, Jennifer AFF:EX <[Jennifer.Mcguire@gov.bc.ca](mailto:Jennifer.Mcguire@gov.bc.ca)>  
**Cc:** Evers, Charlene AFF:EX <[Charlene.Evers@gov.bc.ca](mailto:Charlene.Evers@gov.bc.ca)>  
**Subject:** FW: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
I haven't looked yet.

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**From:** [nfacc@xplornet.com](mailto:nfacc@xplornet.com) <[nfacc@xplornet.com](mailto:nfacc@xplornet.com)>  
**Sent:** March 24, 2021 11:09 AM  
**To:** Ethier, Tom AFF:EX <[Tom.Ethier@gov.bc.ca](mailto:Tom.Ethier@gov.bc.ca)>  
**Subject:** RE: 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello Mr. Ethier,  
Thank you for your letter and Ministry responses. Attached is a follow up.  
Best regards,  
Jackie  
Jackie Wepruk  
NFACC General Manager  
(T) 403.783.4066  
[nfacc@xplornet.com](mailto:nfacc@xplornet.com)  
[www.nfacc.ca](http://www.nfacc.ca)

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**From:** Evers, Charlene AFF:EX <[Charlene.Evers@gov.bc.ca](mailto:Charlene.Evers@gov.bc.ca)> **On Behalf Of** Ethier, Tom AFF:EX  
**Sent:** March 5, 2021 5:21 PM  
**To:** 'nfacc@xplornet.com' <[nfacc@xplornet.com](mailto:nfacc@xplornet.com)>  
**Subject:** 193863 - Response from DM Tom Ethier re: Farmed Mink Code Review  
Good afternoon,  
Please see the attached letter and Ministry responses for your consideration.  
Regards,  
**Tom Ethier**  
Deputy Minister  
Ministry of Agriculture, Food and Fisheries

**Ministry of Agriculture, Food and Fisheries**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION**

Ref: 193901

Date: February 18, 2021

**Title:** The British Columbia Society for the Prevention of Cruelty to Animals' (BC SPCA) Opposition to the National Farm Animal Care Council (NFACC) Farmed Mink Code Amendments.

**Issue:** The BC SPCA has publicly stated that the amendments to the NFACC Code of Practice for the Care and Handling of Farmed Mink (Farmed Mink Code) represent a decline in animal welfare. The BC SPCA called on its supporters to oppose the amendments.

**Background:**

The NFACC leads the process to develop codes of practice that serve as a national understanding of farmed animal care requirements and recommended practices. The codes of practice are developed through broad representation and expertise on Code Development Committees, including a Scientific Committee that identifies a list of priority animal welfare issues for the species being considered. The current Farmed Mink Code was developed through NFACC's code development process and published in 2013. According to NFACC Code Maintenance Protocols, the Farmed Mink Code underwent a five-year review in 2018 resulting in recommended amendments in relation to four major challenges (1. pen sizes; 2. access to nest boxes; 3. reference to the proper method of catching a mink and lifting from its pen; and 4. euthanasia methods) and one moderate challenge (1. identification of body condition extremes, i.e., over and under conditioned mink). Proposed revisions to the current Farmed Mink Code were open to a public comment period from December 2020 to February 2021. Ministry staff coordinated an internal review of the proposed revisions and provided a response to NFACC (see *Appendix A*). A revised Farmed Mink Code is expected by March 2021.

Compliance with the NFACC codes of practice is not required by federal law but is required by provincial law in some jurisdictions. Some provinces (e.g., Manitoba and Newfoundland) have made the NFACC codes of practice requirements enforceable whereas other provinces (e.g., B.C. and Saskatchewan) reference the NFACC codes as reasonable and generally accepted practices of animal management. The B.C. Fur Farm Regulation is based on requirements set out in the 2013 NFACC Mink Code. In 2019, B.C.'s Animal Care Codes of Practice Regulation became law, which references all 12 NFACC Codes (Beef Cattle; Bison; Chickens; Turkeys and Breeders; Equine; Farmed Deer; Farmed Fox; Farmed Mink; Pigs; Pullets and Laying Hens; Rabbits; Sheep; and Veal Cattle) as reasonable and generally accepted practices of animal management under the *Prevention of Cruelty to Animals Act*. At the time this regulation came into force, it was anticipated future NFACC codes of practice would be referenced under this regulation.

In April 2008, the BC SPCA Board of Directors approved the organization's Position Statement on Animals Used for Clothing, Fashion and Art. The BC SPCA "is opposed to the infliction of pain or suffering upon, or the killing of any animal, explicitly for clothing or any aesthetic purpose." As a result of this stance, on January 26, 2021, the BC SPCA released a media statement and email campaign to supporters that claimed that the new proposed changes to the NFACC Farmed Mink Code represented a rollback in animal welfare requirements. The organization specifically stated "[p]roposed Code amendments would halt a move to larger cage sizes and also allow mink across Canada to be killed by having them breathe in engine exhaust or carbon dioxide." This statement was also reiterated in the meeting between the BC SPCA and the Minister of Agriculture, Food and Fisheries (the Ministry) on January 28, 2021.

The BC SPCA has played a significant role in the development of NFACC codes of practice. The BC SPCA partners with Humane Canada to represent the animal welfare movement on many of the NFACC code

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committees, including the current Goat Code Development Committee. The BC SPCA was not a member of the NFACC Farmed Mink Code Amendment Committee.

**Discussion:**

Overall, the BC SPCA's statement is an oversimplified, and partially inaccurate, account of the Farmed Mink Code amendments. The BC SPCA claims that the Farmed Mink Code amendments are being driven by the desires of the mink industry. However, the NFACC's code development process includes a scientific committee review of research on priority mink welfare issues, as well as broad stakeholder representation including farmers/producers, transporters, veterinarians, animal welfare and enforcement agencies, retail organizations, processors, and governments. For example, representative organizations include the Canadian Veterinary Medical Association, the Government of Nova Scotia, the Canadian Food Inspection Agency, and individual representation by researchers/academics, technical experts, and an animal welfare professor whose research focuses specifically on farmed mink.

The BC SPCA also states the proposed amendments decrease animal welfare. In terms of cage sizes, the 2013 Farmed Mink Code required all existing cages to be upgraded to meet new existing cage size requirements by December 31, 2023. Existing cage requirements were slightly smaller than new cage requirements, but cages that met the existing cage requirements could be used for the lifetime of the cages. The NFACC has proposed to remove the requirement to upgrade to the existing cage size requirements by 2023 due to cost prohibitions and a lack of evidence of increased animal welfare. Instead, the amendments propose a new requirement for "non-compliant" existing cages with minimum sizes smaller than the existing cage requirements. If the cages already meet or exceed these standards, they can continue to be used for the lifetime of the cage.

The proposed amendments do not represent an abandonment of the goal of expanding cage sizes; rather, the amendments remove the requirement to upgrade cage sizes before some existing cages are no longer usable. In comments provided to NFACC, Ministry staff were wary of the decision to remove the requirement to upgrade cage sizes, highlighting the previous reference to an increase in welfare from an increase in cage sizes. Staff noted the need to investigate other areas where welfare could be improved if cage sizes are not increased.

In terms of euthanasia, the 2013 Code stated that carbon monoxide (CO) was the only approved method of euthanasia, with the CO generally coming from a commercially supplied cylinder or tank. In consultation, it was noted that the Farmed Mink Code was one of the few codes with only one approved method of euthanasia; industry also highlighted issues in obtaining CO cylinders. The proposed amendments allow "back-up" methods of euthanasia if CO gas cylinders cannot be sourced or used. The proposed back-up methods include the use of carbon dioxide (CO<sub>2</sub>) from a compressed gas cylinder or CO from a "proven effective combustion source (e.g., engine)." It must be noted that the amendments require CO<sub>2</sub> to be from a compressed gas cylinder and achieve concentration of at least 80 percent; exhaust CO must be cleaned, cooled, and achieve a concentration of at least 4 percent. While engine exhaust is proposed as an acceptable method of euthanasia, the exhaust must contain enough CO to reduce suffering.

While the proposed amendments do allow for the use of CO<sub>2</sub> and CO from engine exhaust, the specific requirements are missed in the BC SPCA statement. The amendments establish specific requirements for the use of these euthanasia methods to ensure that animal suffering is minimized. However, Ministry staff also noted issues with the proposed uses of CO and CO<sub>2</sub> for euthanasia in their comments to the NFACC. Ministry staff feel that use of combustion CO for euthanasia is difficult and, therefore, not appropriate both from a humane killing or human safety standpoint. Additionally, Ministry staff noted that even when 100 percent CO<sub>2</sub> is achieved, there is extended time for loss of consciousness and death. CO<sub>2</sub> is also harmful to mammals, especially semi-aquatic mammals such as mink. If CO<sub>2</sub> is to be used as a back-up method, Ministry staff state that it needs to be clear that the CO<sub>2</sub> must come from a commercial cylinder or tank. Staff also noted hopes for better euthanasia methods in future, such as non-penetrating captive bolt.

The BC SPCA's statement references the 2023 deadline for cage upgrades has been removed, and engine exhaust is being considered as an acceptable form of euthanasia. However, the BC SPCA's statement oversimplifies the amendments in a way that supports their position against mink farming. Ministry staff highlighted similar concerns with the proposed amendments but noted ways the amendments could be improved.

The NFACC codes of practice, and the process under which they are developed, are important tools to ensure continual farm animal welfare improvement in Canada. NFACC codes of practice are based on current animal welfare science, consensus among a diverse group of stakeholders, and input from the general public. However, given the consensus nature of the process, it is expected the NFACC codes of practice requirements will not always achieve 100 percent support by all interested parties.

**Summary:**

- The BC SPCA's statements oversimplify the amendments in a way that supports their argument against mink farming.
- Ministry staff with animal welfare and/or mink expertise reviewed the proposed Farmed Mink Code amendments and provided recommendations through the NFACC consultation process; and a formal B.C. submission will be supplied by the AFF DM.
- The NFACC codes of practice are important tools to ensure continual farm animal welfare improvement in Canada.
- It is important for the Ministry to actively engage in the NFACC code of practice development and review processes and reiterate the importance of and the need for continual animal welfare improvement.

Contact: Lauren Yawney, Senior Legislation Analyst, 236 478-3443  
Terri Giacomazzi, Senior Policy Analyst, 778 666-0552

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ADM JLM

DM TE

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## **APPENDIX A**

### **NFACC Code of Practice for the Care and Handling of Farmed Mink BC Ministry of Agriculture-Comments 2021**

#### General Feedback:

- Provincial government review of codes typically includes staff from policy, operations, and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and results in a consolidated BC submission. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide general comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

#### **Section 1.2.2**

##### **Pens:**

This is a difficult situation that leaves us conflicted. If in 2013 it was determined that mink cage sizes needed to increase to optimize welfare, it is not acceptable to walk back on this requirement. Decreased profit margins over the past 10 years should not be informing the changes to the code, as the economics of this industry are separate from ensuring optimal animal welfare conditions.

We encourage further research on mink housing and, especially, enrichment. It wasn't clear that a table tennis ball was enough enrichment for the life of the animal; additional enrichment options should be seriously explored and implemented.

#### **Section 1.2.3**

##### **Nest boxes:**

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements. Reducing the requirements for this component is not clear and not supported by B.C.

#### **Section 3.1**

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Nutrition:

We appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

### **Section 3.1.1**

Breeding Mink:

Is selection of breeders efficient prior to furring? Overall, we agree with the requirements and recommendations. The mink producers we have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: We do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

### **Section 5.1**

Animal Handling:

It isn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

### **Section 6.1**

Euthanasia methods:

The literature seems to indicate very specific equipment for using CO from combustion. This is not clear in the suggested edits and seems to recommend CO from combustion engines. B.C. does not see this is appropriate both from a humane killing point of view, or human safety. It is also not clear that CO<sub>2</sub> is best practise considering its aversive nature to mammals and especially semi-aquatic mammals. The literature recommends 100% CO<sub>2</sub>, which is difficult to achieve and even then, causes extended time to death and loss of consciousness. Humane killing recommendations have been moving further away from the use of CO<sub>2</sub> in mammalian species for these reasons in general. B.C. would like to see better methods on the horizon. Has there been any work on methods such as non-penetrating captive bolt in this species? There should also be a distinction between euthanasia (to prevent suffering from illness, disease, injury); humane killing (for harvest purposes); and depopulation (rapid killing for disease control).

In relation to:

Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

We realize there may be information in the preamble, however, appropriate wording such as "CO<sub>2</sub> from a compressed cylinder may be used for euthanizing mink on farm in the absence of CO." B.C. supports that it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

### **Section 6.2**

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Evidence to Confirm Death:

In relation to:

“The requirement was amended to clarify the two indicators that must be checked to confirm death.” “Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes.”

Which are the two indicators of the previously recommended five that are now acceptable?

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Withheld pursuant to/removed as

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## APPENDIX A

### NFACC Code of Practice for the Care and Handling of Farmed Mink BC Ministry of Agriculture-Comments 2021

#### General Feedback:

- Provincial government review of codes typically includes staff from policy, operations and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and is internally approved by Executive. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide general comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

#### **Section 1.2.2**

##### **Pens:**

This is a difficult situation that leaves us conflicted. If in 2013 it was determined that mink cage sizes needed to increase to optimize welfare, it is hard to accept walking back on this requirement even though profit margins over the past 10 years have considerably decreased.

We encourage further research on mink housing and, especially, enrichment, however if there is less money in the industry, I wonder who will be funding this. What about a trade-off between enrichment and pen size? If pen size can't practicably be increased, could enrichment be improved? It wasn't clear that a table tennis ball was enough for the life of the animal.

#### **Section 1.2.3**

##### **Nest boxes:**

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements.

#### **Section 3.1**

##### **Nutrition:**

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We appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

#### **Section 3.1.1**

##### **Breeding Mink:**

Is selection of breeders efficient prior to furring? Overall, we agree with the requirements and recommendations. The mink producers we have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: We do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

#### **Section 5.1**

##### **Animal Handling:**

It isn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

#### **Section 6.1**

##### **Euthanasia methods:**

The literature seems to indicate very specific equipment for using CO from combustion. This is not clear in the suggested edits and seems to recommend CO from combustion engines. We don't think this is appropriate both from a humane killing point of view, or human safety. It is also not clear that CO<sub>2</sub> is best practise considering its aversive nature to mammals and especially semi-aquatic mammals. The literature recommends 100% CO<sub>2</sub>, which is difficult to achieve and even then, causes extended time to death and loss of consciousness. Humane killing recommendations have been moving further away from the use of CO<sub>2</sub> in mammalian species for these reasons in general. We would sincerely hope better methods are on the horizon. Has there been any work on methods such as non-penetrating captive bolt in this species? There should also be a distinction between euthanasia (to prevent suffering from illness, disease, injury); humane killing (for harvest purposes); and depopulation (rapid killing for disease control). Methods of killing may have different requirements for all these purposes and the distinction is not clear as to what we're talking about in this document, and the reason for needing to use a less than humane method. Is there often shortages of CO during harvest, or in general?

##### **In relation to:**

Euthanasia Methods "Requirement added on when a back-up method may be used and all context on acceptable back-up methods was added to the preamble. Back-up methods were informed by research and veterinary guidance, as noted in the new references." "The existing requirement on the required concentration of gas was amended to reflect the required concentration should carbon dioxide be used as a back-up method."

We realize there may be information in the preamble, however, appropriate wording such as "CO<sub>2</sub> from a compressed cylinder may be used for euthanizing mink on farm in the absence of CO." We think it should be clearly stated that if a back-up method is to be used, the back-up methods must also be commercially supplied in a cylinder or tank.

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**CONFIDENTIAL**

## **Section 6.2**

Evidence to Confirm Death:

In relation to:

“The requirement was amended to clarify the two indicators that must be checked to confirm death.” “Context was added to the preamble explaining the need to assess / re-assess breathing over 5 minutes.”

Which are the two indicators of the previously recommended five that are now acceptable?

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**CONFIDENTIAL**



February 4, 2021

File:

Ref:

Jackie Wepruk, General Manager  
National Farm Animal Care Council  
P.O. Box 5061  
Lacombe, Alberta T4L 1W7  
Email: [nfacc@xplornet.com](mailto:nfacc@xplornet.com)

Dear Ms. Wepruk and Council Members,

On behalf of the Province of British Columbia, staff at the Ministry of Agriculture, Food and Fisheries (AFF) have reviewed the proposed amendments to the 2013 farmed mink Code of Practice (the Code). We are hopeful this process will result in an evidence-based Code that will be acceptable by stakeholders and the general public.

Much like with other codes of practice that the National Farm Animal Care Council (NFACC) has developed, B.C. has considered how it will be reflected in our existing regulatory framework for animal protection. In B.C., the *Prevention of Cruelty to Animals Act* and the *Animal Care Code of Practice Regulation* (the Regulation) reference NFACC codes of practice in the Regulation, including the 2013 farmed mink Code. Given the significant pressure on the Ministry with respect to farmed mink in B.C., we would like to review the updated Code when available in order to examine how it may be reflected in current regulations.

In reviewing the proposed changes, we noted some additional areas of the Code and the review process that could be improved (please see the attached). It is critical the Code be clear, measurable, and continually improving to meet animal welfare needs and societal expectations. Provincial staff are following up with technical comments through the online portal.

.../2

We look forward to continuing to participate in the revision of this Code.

Sincerely,


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**Ministry of Agriculture, Food  
and Fisheries**

Office of the Deputy Minister

Mailing Address:  
PO Box 9120 Stn Prov Govt  
Victoria BC V8W 9B4  
Telephone: 250 356-1800  
Facsimile: 250 356-8392

Location:  
5th floor, 545 Superior Street  
Victoria BC V8V 1T7  
Web Address: <http://gov.bc.ca/agri/>

A handwritten signature in black ink, appearing to read 'Tom Ethier'.

Tom Ethier  
Deputy Minister

cc: Timothy J. Kennedy

**NFACC Code of Practice for the Care and Handling of Farmed Mink**  
**BC Ministry of Agriculture-Comments 2021**

General Feedback:

- Provincial government review of codes typically includes staff from policy, operations and veterinary health management. There is need for a better process to provide a single provincial government response that combines input from several staff and is internally approved by Executive. The current code development and review process does not allow for that.
- We understand the information provided through the survey is a summary and not necessarily what will be revised in the code. Without review of the draft changes incorporated into the proposed code (i.e. an actual draft code rather than a table of proposed changes), it is difficult to gain a sense of the overall proposed code and provide general comments. We would prefer to review and comment on an entire draft code.
- Governments are increasingly experiencing public pressure with respect to farmed animal welfare; there is a need for continual and substantial improvements in all codes particularly the requirements.
- Where animal welfare research is lacking, what mechanisms can be used to support research in specific areas relevant to code development and review? It is not clear how the NFACC process can and/or does contribute to or address research needs. This should be examined.

**Section 1.2.2**

Pens:

This is a difficult situation that leaves us conflicted. If in 2013 it was determined that mink cage sizes needed to increase to optimize welfare, it is hard to accept walking back on this requirement even though profit margins over the past 10 years have considerably decreased.

We encourage further research on mink housing and, especially, enrichment, however if there is less money in the industry, I wonder who will be funding this. What about a trade-off between enrichment and pen size? If pen size can't practicably be increased, could enrichment be improved? It wasn't clear that a table tennis ball was enough for the life of the animal.

**Section 1.2.3**

Nest boxes:

It did not appear from the mink review of scientific literature that removing the nest box was effective for re-training mink. Given the documented reduction in welfare from removing a nest box as well as the lack of evidence given for the time limit stated, it is unclear why this was changed in the requirements.

**Section 3.1**

Nutrition:

We appreciate that the existing requirement re: conditioning may be vague, however, waiting until the animals are at the extremes of the condition score scale may be too late or detrimental for intervention. Were there specific situations identified that showed the apparent vagueness led to poor outcomes?

**Section 3.1.1**

Breeding Mink:

Is selection of breeders efficient prior to furring? Overall, we agree with the requirements and recommendations. The mink producers we have visited were quite attentive to the need for and implementing changes to feed requirements.

Language recommendation: We do not see a requirement for corrective action if males lose condition during the breeding season. Corrective action should not be implied, it should be required. The same is true for section 3.1.1, Water Quality. Corrective action for poor water quality should be required, not implied, in relation to testing.

## **Section 5.1**

Animal Handling:

It isn't clear where the reference was regarding selection of calm temperament. Is this heritable in mink? Is it associated with other selection criteria, like colour?

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