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s.12 ; s.13 ; s.14

Ministry of Agriculture, Food and Fisheries
BRIEFING NOTE FOR MINISTER FOR DECISION

Ref: 195460

Date: August 3, 2021

Title: Proposed Fur Farm Regulation amendments

Issue: Need to codify the recent Provincial Health Officer (PHO) Order in legislation.

Background:

Substantive background information can be found in CLIFF 194646 (Appendix A)

On July 26, 2021 the British Columbia (B.C.) PHO Dr. Bonnie Henry issued an order under the *Public Health Act* prohibiting the opening of new mink farms and requiring a cap on the number of animals on existing farms. Subsequently, the Ministry of Agriculture, Food and Fisheries (AFF) released a statement stating that the Ministry is undertaking amendments to the Fur Farm Regulation to ensure enduring compliance with health protection strategies outlined in the June 29, 2021 Public Health Risk Assessment of Farmed Mink report (Appendix B).

Concerns regarding the spread of the SARS-CoV-2 virus in mink farms and the impact of a mutated virus on vaccines have led to calls for mink culls and an end to mink and fur farming internationally. Culls of animals on infected farms have occurred in the Netherlands, France, Spain, and Poland, with Denmark culling all mink in the country. Public opposition to fur has also led to the creation or promise of fur farming bans in several countries (see Appendix A).

Prior to the COVID-19 pandemic, the fur farming industry has been in a general decline internationally. In B.C., the number of mink farms decreased from 17 licensed farms and 14 licensed operators in 2016 to 13 mink farms and seven operators in 2021. There are 9 operating mink farms, each employing between one and 30 employees. Employees are generally domestic workers, with 5 temporary foreign workers currently on farm. All the farms are on privately owned parcels of Agricultural Land Reserve (ALR) land, and none are on First Nations land.

Mink production in B.C. has been inherently unprofitable for the last several years. Pelt prices have been inadequate to cover operating costs (e.g. feed, labour) for most mink producers. Based on data developed in support of the AgriStability program and taken from established sources (e.g. StatsCan, USDA) average market prices for pelts dropped from a high in 2011 of \$97.07 to a low of \$26.51 in 2020. The price had trailed off to a low of \$18.70 in December 2020; however, there is likely a significant amount of 2020 production which has not yet been marketed. The closure of normal auction events and a need for cashflow and shortage of storage space may have contributed to very low prices late in the year. Prices are volatile year

to year but there has been a general decline in the demand and prices of mink pelts for several years.

A small number of North American pelts were sold at the Copenhagen fur action in April of 2021 at an average price of \$35.91; these would be pelts produced in 2020. It is unknown if this is a return to more normal prices spurred on by reduced production from Denmark culling all their mink, or if this is an anomaly from a small sales volume offseason from the bulk of normal sales. Additional auctions will need to be observed to establish a reasonable estimate of current prices. Public opposition to fur farming continues for both health and animal welfare reasons, which may impact demand.

The farmed fur industry has experienced considerable market declines in recent years. The increasing public opposition to the use of fur has prompted designer brands such as Chanel, Gucci, Burberry, Versace, Coach, Michael Kors, Jimmy Choo, Ralph Lauren, and others to ban the use of fur in their designs. The use of fur is also banned in more affordable brands such as ASOS, Gap, H&M, J. Crew, Macy's, Topshop, and Urban Outfitters. Even Canada Goose, a brand infamous for use of coyote fur on their parkas, has announced its intention to stop using real fur by 2022.

There is broader trend in society towards increased welfare considerations for animals used for human purposes. In the U.S. there have been increased regulations on the use of animals in scientific testing, as well as bans on farm practices such as the use of gestation crates in swine production. There is a large market for cruelty-free and vegan cosmetics products, with the cruelty-free cosmetics industry estimated to be worth \$10 billion USD by 2024. In B.C., the Ministry has received large amounts of correspondence from multiple groups and individuals calling for an end to mink farming, and fur farming more generally, in the province. Following the first B.C. mink farm SARS-CoV-2 infection, the B.C. Society for the Prevention of Cruelty to Animals (B.C. SPCA) publicly called for an end to fur farming in B.C. A survey referenced by the B.C. SPCA suggests that 85% of B.C. respondents are opposed to fur farming.

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First Nations Considerations:

Under the modern treaty agreements, B.C. is required to notify each of the Treaty First Nations of proposed legislation if the respective Final Agreement provides that Treaty First Nation Government with law making authority in respect of the subject matter of the legislation. The Tsawwassen, Maa-nulth and Tla'amin Final Agreements all have law-making authority related to the regulation of business and land, which is the most analogous to the regulation of mink farming. None of the existing mink fur farms are located on First Nations lands, however, the amendments prohibit future fur farms, which could include farms located

on those lands. Therefore, the treaty requirement to notify the Treaty First Nations is likely triggered.

Additionally, the duty to consult Indigenous Peoples is triggered when contemplated Crown conduct has the potential to adversely affect asserted or proven Aboriginal rights, title, or treaty rights (Section 35 Rights). Aboriginal title includes the right to decide how the land will be used and includes the economic benefits of that land. As the prohibition on mink farming limits a particular use of land that an Aboriginal title holder may choose in the future, the proposed regulation could constitute an adverse effect on s. 35 Aboriginal title sufficient to trigger the duty to consult.

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Attachments:

APPENDIX A: CLIFF 194646

APPENDIX B: June 29, 2021 Public Health Risk Assessment of Farmed Mink report

APPENDIX C: Timeline for implementation

APPENDIX D: Mink Farming Policy Analysis

APPENDIX A

Ministry of Agriculture, Food and Fisheries BRIEFING NOTE FOR MINISTER FOR DECISION

Ref: 194646

Date: May 26, 2021

Title: Continuation of Fur Farming in B.C. with ongoing COVID presence

Issue: Outbreaks of SARS-CoV-2 in populations of farmed mink, increased risk to human health from virus mutations and prevalence of COVID in B.C., and long-term viability of fur farming with ongoing COVID presence

Background:

Fur farming has become an issue of increasing public concern. Due to the SARS-CoV-2 outbreaks on Fraser Valley mink farms, on December 14, 2020 the B.C. Society for the Prevention of Cruelty to Animals (BCSPCA) issued a media release condemning mink farming and calling for an end to the practice in B.C. This release was accompanied by a petition to be brought forward to policy makers. On May 17, 2021, a third Fraser Valley mink farm was put under quarantine due to a SARS-CoV-2 outbreak. In response to this outbreak the BCSPCA released another media statement calling for a ban on fur farming. Public opposition to fur has also led to the creation or promise of fur farming bans in several countries (see Appendix A).

The Ministry of Agriculture, Food and Fisheries (AFF) currently acknowledges and regulates fur farming as an acceptable farm practice in B.C. The legislation governing the industry are the *Prevention of Cruelty to Animals Act*, the Animal Care Codes of Practice Regulation, the *Animal Health Act*, and the Fur Farm Regulation. The regulation of fur farming in B.C. is consistent with other provinces, while approaches to animal welfare regulation varies across provinces.

The fur farming industry has been in a general decline internationally. In B.C., the number of mink farms decreased from 17 licensed farms and 14 licensed operators in 2016 to 11 farms and seven operators in 2020. There is one chinchilla farm and no fox farms currently operating in B.C. The fur farms usually employ between one to 30 employees. Employees are generally domestic workers. See attached Appendix D for detailed information about the economics of the fur farm industry.

Mink are susceptible to catching the SARS-CoV-2 virus from humans, with potential for the virus to mutate in the mink and be re-introduced to humans. Concerns regarding the spread of the virus in farms and the impact of a mutated virus on vaccines have led to calls for mink culls and an end to mink and fur farming internationally. Culls of animals on infected farms have occurred in the Netherlands, France, Spain, and Poland, with Denmark culling all mink in the country.

The Ministry of Health (HLTH) and other agencies are working with the mink industry to implement ongoing human and animal virus surveillance and enhanced COVID-19 safety plans on farms. On February 8, 2021, HLTH estimated there was a low and acceptable risk of a SARS-CoV-2 variant of concern arising at a mink farm, being transmitted to a worker and then to the general population or wildlife, in a way that would significantly threaten the health of the population. This estimate involved a significant degree of uncertainty and assumes that mitigation measures are well implemented, and that industry continues to cooperate with health protocols. HLTH also estimated, with moderate uncertainty, that there is a very low risk of SARS-CoV-2 overflowing from farms, infecting wild animals, and creating a reservoir of ongoing transmission and viral replication.

HLTH risk assessment was provided prior to the increase in SARS-CoV-2 variants of concern and continued high case numbers/third wave in the Fraser Health region. On March 2, 2021, Dr. Emily Newhouse, Medical Health Officer for Fraser Health considered new information and the level of compliance of mink farmers with the COVID safety plans to change the Fraser Health risk assessment from low to moderate risk. An updated risk assessment has been requested from the CDC and Provincial Health Officer and will possibly be completed in June due to pressures on public health from the ongoing third wave of the pandemic. Fraser Health also provided information that Whole Genome Sequencing has identified a mutation of concern in the mink samples (the Y453F mutation); as of March 2, 2021, this mutation has not been linked to any mass outbreaks in humans.

First Nations Considerations:

A ban on fur farming would not impact traditional Indigenous rights to hunting and trapping. Two Indigenous groups have provided perspectives: the Indigenous Trappers of B.C. who support mink farming; and the Union of B.C. Indian Chiefs who oppose mink farming.

Discussion:

There are two key considerations regarding renewed calls to end fur farming in B.C.:

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Approved / Not Approved

LANA POPHAM, Minister

Date Signed

Contact: Lauren Yawney, Senior Legislative Analyst, 236 478-3443

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Attachments:

APPENDIX A: Fur Farm Ban Legislation Jurisdictional Scan

APPENDIX B: Jurisdictions which allow and regulate fur farming

APPENDIX C: Fur Animal Welfare Requirements in Legislation

APPENDIX D: Mink Farming Policy Analysis V.2

APPENDIX A (Ref: 194646)

Fur Farm Ban Legislation Jurisdictional Scan

The purpose of this table is to provide an overview of the varying international legislation regarding fur farms.

In addition to the countries outline below, bans on fur farming also exist in Austria, Slovakia, Belgium, Luxembourg, Slovenia, the Republic of Macedonia, Serbia, Bosnia and Herzegovina, the Czech Republic and Hungary, but substantive information on these laws was unable to be found. Legislation on fur farm bans are also being proposed in Bulgaria, Estonia, Lithuania, Montenegro, and Ukraine.

Full Ban Legislation		
Jurisdiction	Information	Info Links
United Kingdom	<p><u>Primary Instrument</u> <i>Fur Farming (Prohibition) Act</i> created in 2000</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Prohibits “the keeping of animals solely or primarily for slaughter for the value of their fur” in England and Wales Allows for the creation of scheme to allow for compensation of individuals for losses as a result of ceasing business In 2002 the practice was prohibited in Scotland with the <i>Fur Farming (Prohibition) (Scotland) Act</i> and Northern Ireland with the Fur Farming (Prohibition) (Northern Ireland) Order The legislation still allows for the import of animal furs from other countries and the sales of some furs <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Once the UK has officially left the EU, the country is considering a total ban on the sale of fur 	<p>Legislation: UK Act https://www.legislation.gov.uk/ukpga/2000/33/contents</p> <p>Scotland Act https://www.legislation.gov.uk/asp/2002/10/contents</p> <p>Northern Ireland Order https://www.legislation.gov.uk/nisi/2002/3151/contents</p> <p>Other Info: https://www.theguardian.com/politics/2020/sep/25/uk-considering-outright-ban-on-fur-sales-after-brex</p>
Norway	<p><u>Primary Instrument</u> <i>Fur Farming Prohibition Act</i> created in 2018</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires all farms to be closed by February 2025 Allows for compensation to farmers for ceasing business <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Norway was once the world’s largest producer of fox pelts, with 20,000 farms in 1939 	<p>Other Info: https://dyrever.no/dyvern/breaking-news-norway-bans-fur-farming/</p> <p>https://www.reuters.com/article/us-norway-fur-idUSKBN1F426E</p>
California	<p><u>Primary Instrument</u> Assembly Bill 44, which amended the <i>Fish and Game Code</i></p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> The Bill comes into effect January 2023 	<p>Legislation: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB44</p> <p>Other Info:</p>

	<ul style="list-style-type: none"> Bans the sale and manufacturing of fur products in the state Used fur, fur products used for specified purposes, and any activity expressly authorized by federal law are exempt from the bill Allows for fines of up to \$1,000 for repeated violations <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Statewide ban follows bans of fur sales in Los Angeles and San Francisco 	https://www.theguardian.com/world/2019/oct/13/fur-ban-california-outlaws-making-and-selling-new-products
The Netherlands	<p><u>Primary Instrument</u> <i>Fur Farming Prohibition Act</i> created in 2013</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Banned mink farming with a transition period to phase out farms by 2024 Allows for compensation to farmers for ceasing business Following a COVID-19 outbreak at more than 40 farms, the phase out timeline was brought up to March 2021 Minks at the COVID-19 affected farms were culled in the interest of public health Farmers at the farms unaffected by COVID-19 could slaughter their mink in 2020, but are not allowed to re-stock <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> The Netherlands is the European Union's second largest mink producer Fox and chinchilla fur farming was phased out in the country in the mid-1990s 	<p>Other Info:</p> <p>https://nos.nl/artikel/2345662-kabinet-maakt-eind-aan-nertsenfokkerij-alle-bedrijven-volgend-jaar-dicht.html</p> <p>https://www.hsi.org/news-media/dutch-mink-fur-farms-to-be-permanently-closed/</p>
Croatia	<p><u>Primary Instrument</u> <i>Animal Protection Act</i></p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Legislation initially introduced in 2007 and came into effect in 2017 Provided a ten-year phase out period for existing fur farms prior to full adoption Prohibits the farming and breeding of animals for fur production purposes 	<p>Legislation:</p> <p>http://www.mvep.hr/files/file/dokumenti/prevodenje/zakoni/25-Zakon-o-za%C5%A1titi-%C5%BEivotinja--NN-102-17-ENG.pdf</p>
Bans as an effect of other legislation		
Japan	<p><u>Primary Instrument</u> <i>Invasive Alien Species Act</i> created in 2005</p> <p><u>Key Facts</u></p>	<p>Legislation:</p> <p>https://www.env.go.jp/en/nature/as.html</p>

	<ul style="list-style-type: none"> Bans actions of raising, planting, storing, carrying or importing invasive alien species The American Mink is considered an invasive alien species under the Act, effectively making their farming illegal <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Mink farms built prior to 2006 could continue operation The singular mink farm existing in Japan ceased operation in 2015 after years of animal welfare issues 	<p>Other Info: https://www.furfreealliance.com/japan-makes-end-fur-farming/</p>
Germany	<p><u>Primary Instrument</u> <i>Animal Products Trade Prohibition Act</i> created in 2017</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires strict requirements for keeping animals, such as increased cage sizes and swimming basins for mink Farms permitted to keep operating without adapting to new legislation until 2022 <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> The stricter welfare requirements made fur farming unprofitable The last fur farm in the country closed in 2019 	<p>Legislation: http://www.gesetze-im-internet.de/khfeverbg/BJNR239400008.html#BJNR239400008BJNG000300124</p> <p>Other Info: https://www.tagesspiegel.de/gesellschaft/panorama/pelze-in-der-letzten-deutschen-nerzfarm-sind-keine-tiere-mehr/24151900.html</p>
Sweden	<p><u>Primary Instrument</u> <i>Animal Welfare Act</i> created in 1988 and amended in 2018</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires animals to be able to “perform behaviours for which they are strongly motivated for and that are important for their well-being (natural behaviour)” <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Introduction of the legislation instituted stricter requirements on the keeping of fur animals Required foxes to only be kept in such a way that they can be active, dig and socialize with other foxes New requirements rendered fox farming economically unsustainable in the country, closing all farms in 2001 Mink farms are still allowed under the legislation 	<p>Legislation: https://www.government.se/494b85/contentassets/9f6a4e0fb1704a0ba72531b63811ac22/animal-welfare-act-sfs-2018-1192-12-mars-2020.pdf</p> <p>Other Info: https://www.djurensratt.se/blogg/decline-swedish-fur-industry#:~:text=Fur%20farming%20came%20to%20Sweden,2%20million%20pelts%20a%20year.</p>
Bans promised or currently being debated		
France	<u>Key Facts</u>	https://www.loc.gov/law/foreign-

	<ul style="list-style-type: none"> Planned ban introduced in a speech September 29, 2020 by Minister of Environmental Transition Barbara Pompili No new farms will be authorized, and all existing farms must close by 2025 <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Does not impact the orylog rabbit fur industry 	news/article/france-french-government-announces-ban-on-wild-animal-performances-and-mink-farming/ https://www.reuters.com/article/us-france-animals-circus-idUSKBN26K24V
Poland	<p><u>Key Facts</u></p> <ul style="list-style-type: none"> Planned ban introduced in September 2020 Closure of all existing farms within a year of the ban passing Ban would impact 700 of the 810 fur farms in Poland Currently, no compensation for farmers referenced in the bill 	https://www.theguardian.com/environment/2020/sep/29/film-showing-cannibalism-prompts-probable-ban-on-fur-farms-in-poland
Ireland	<p><u>Key Facts</u></p> <ul style="list-style-type: none"> Phased removal of all fur farms in the country (three in operation currently) <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Prohibition of Fur Farming Bill 2018 put forward in government and got to the first stage of the legislative process, but was not passed any further due to dissolution of the government. 	https://www.thejournal.ie/future-of-fur-mink-farming-ireland-5271940-Nov2020/ https://www.politico.eu/article/ireland-signals-likely-end-to-fur-farming-with-cull-of-120000-mink/ https://www.gov.ie/en/press-release/28e8c1-government-approves-phasing-out-of-fur-farming/?referrer=http://www.agriculture.gov.ie/press/pressreleases/2019/june/title,128816,en.html

APPENDIX B (Ref: 194646)

<u>Jurisdictions which allow and regulate fur farming</u>	
The following table outlines jurisdictions where fur farming is allowed and regulated. This table does not provide an exhaustive list of countries where fur farming is allowed; instead, it highlights jurisdictions which produce the most pelts.	
Canada	Fur farms exist in all provinces, but most farms are found in the following provinces: <ul style="list-style-type: none">• Ontario• Nova Scotia• British Columbia• Newfoundland and Labrador• Prince Edward Island• Quebec
United States	Fur farms exist in 23 states, with the following states producing the most pelts annually: <ul style="list-style-type: none">• Wisconsin• Utah• Idaho• Oregon• Minnesota
International	In addition to Canada and the United States, the following countries' fur farms produce the most pelts annually: <ul style="list-style-type: none">• Denmark• Finland• Spain• Russia• China

APPENDIX C (Ref: 194646)

Fur Animal Welfare Requirements in Legislation

This table provides a comparison of the animal welfare requirements in legislation in different jurisdictions. Sweden and Germany were chosen for comparison as these countries' welfare requirements have made some or all fur farming economically unviable within the countries. The legislation governing animal welfare in the different jurisdictions are as follows:

British Columbia: The Fur Farm Regulation, *Animal Health Act*, *Prevention of Cruelty to Animals Act* (PCAA), Animal Care Codes of Practice Regulation

Canada: The National Farm Animal Care Council's Code of Practice for the Care and Handling of Farmed Mink and Code of Practice for the Care and Handling of Farmed Fox (*Vulpes vulpes*), the *Criminal Code*

Sweden: *Animal Care Act*, Animal Welfare Ordinance, Regulations and general guidelines of the Swedish Board of Agriculture on the rearing and keeping of fur animals

Germany: *German Animal Welfare Act*

General animal welfare requirements		Mink	Foxes	Chinchillas
BC	<p>Care Requirements</p> <ul style="list-style-type: none"> - Persons responsible for an animal must not cause or allow an animal to be in distress. - Animals must be protected from circumstances likely to cause distress - Animals must have access to a sufficient food supply and clean, palatable water. <p>Facility Requirements</p> <ul style="list-style-type: none"> - Must protect the animals from extreme weather. - Must be sufficiently lighted and allow for access to sufficient hours of continuous daylight. - Must allow for the observation and care of animals. <p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be of sufficient size to comfortably accommodate all animals intended to be held. - If more than one animal is in a cage there must be either another level or a nest box. - Must be safe and clean and allow for proper drainage when washed. - Must allow air to flow freely in around the cage. 	<ul style="list-style-type: none"> - Reasonable and generally accepted practices for care are described in the Code of Practice for the Care and Handling of Farmed Mink. - The Code referenced can be used as a defence against conviction under the PCAA. 	<ul style="list-style-type: none"> - Reasonable and generally accepted practices for care are described in the Code of Practice for the Care and Handling of Farmed Fox (<i>Vulpes vulpes</i>). - The Code referenced can be used as a defence against conviction under the PCAA. 	<ul style="list-style-type: none"> - No specific requirements established.¹
Canada	<p>Care Requirements</p> <ul style="list-style-type: none"> - Everyone who willfully causes, or allows, unnecessary pain, suffering or injury to an animal commits an offence under the <i>Criminal Code</i> 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Cages with multiple animals must have a hammock/shelf/platform and at least one manipulative enrichment 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Mature foxes must be housed individually, with pups housed in pairs or groups 	<ul style="list-style-type: none"> - No specific requirements established.

	<p>- Producers must ensure welfare needs (e.g. clean water, sufficient feed to maintain health and vigour, shelter and environmental enrichment) can be met on site.</p> <p>Facility Requirements</p> <p>-Air flow for dry, healthy environment and prevention of excessive heat and cold is always required.</p> <p>- Must replicate daylight provided by a natural photoperiod.</p> <p>- Any light provided must be sufficient to express natural behaviours.</p> <p>- Artificial lighting must not negatively impact the normal circadian rhythm.</p> <p>- Must allow animals to observe each other.</p> <p>Cage requirements</p> <p>-Access to water is always required.</p> <p><i>Nest boxes:</i></p> <p>- Must be designed to hold adequate bedding and allow for good nesting behaviour to provide a comfortable, safe, and secluded place.</p> <p>- Must be able to accommodate all animals in the pen comfortably at the same time.</p>	<p>Minimum dimensions: 0.20-0.25m length, 0.38m height, 1.45-2.22 m² minimum floor space</p> <p>- If over two animals in cage, a minimum of 0.65m² per additional animal.</p>	<p>- All foxes must have access to at least one enrichment that can manipulated.</p> <p>Minimum dimensions: <i>Single foxes:</i> 0.91m length, 0.91m height, 1.1-1.4m² minimum floor space</p> <p>- Pairs of animals to have a minimum of 0.84m² per animal.</p>	
Sweden ²	<p>Care requirements</p> <p>- Animals must be kept and cared for in a good environment such that: 1. well-being is promoted; 2. animals are able to express natural behaviours; and 3. behavioural disorders are prevented.</p> <p>- Animals must be observed at least once per day and kept in a way that allows observation without difficulty or disturbance</p> <p>- Action must be taken immediately if abnormal behaviour is noticed</p> <p>- Animals must be provided with daylight access beyond windows</p> <p>- Animals must be protected from direct sunlight and not kept in constant darkness or light</p>	<p>Care requirements</p> <p>- Adult animals may not be kept together</p> <p>- Claws should be inspected and cut regularly</p> <p>- Regular food requirements must not be reduced to bring about weight loss</p> <p>- Feeding must occur twice a day</p> <p>Cage Requirements</p> <p>- Requirements for climbing cages, platforms in every cage, nest boxes with bedding material and enrichment</p>	<p>Care requirements</p> <p>- Animals must be kept in a way that satisfies their need to socialise with other foxes and to move, dig and otherwise occupy themselves.³</p>	<p>Care requirements</p> <p>- Animals must be kept in pairs</p> <p>- Freedom of movement must not be restricted by obstructing objects such as a collar</p> <p>- Chinchillas must be protected against sudden and loud noises</p> <p>Cage Requirements</p> <p>- Requirements for multi-level cages, enrichment objects and access to sand</p>

	<ul style="list-style-type: none"> - Animals must be exposed to and accustomed to humans starting at a young age - Killing and pelting must take place away from live animals - Animals must be kept satisfactorily clean <p>Facility Requirements</p> <ul style="list-style-type: none"> - Must be designed to prevent disturbances from noise, pollution or other factors - Light level must be sufficient for animals to behave normally and correspond to the animals' natural circadian rhythm - Presence of pests must be minimized <p>Cage Requirements</p> <ul style="list-style-type: none"> - Provide enough space to meet the normal need for movement and appropriate enrichment - Cages lined up so animals cannot harm one another 	<p>objects that must be replaced regularly</p> <ul style="list-style-type: none"> - Cages must not be kept on top of each other <p>Minimum dimensions: 0.8m length, 0.45m height, 0.255m² bottom area</p> <ul style="list-style-type: none"> - Area should be increased by 0.085m² for each additional young animal 		<p>baths at least once per day</p> <p>Minimum dimensions: 0.5m width, 1m height, 0.5m² total area</p> <ul style="list-style-type: none"> - Area should be increased by 0.16m² for each additional young animal
Germany	<p>Facility Requirements</p> <ul style="list-style-type: none"> - Must allow for the natural behaviour of the animal, and allow them to eat, drink and rest according to their species. - Must be equipped with frost-protected watering devices and allow constant access to drinking water. - Must allow for the removal of the fur animals without pain or avoidable suffering. - Must offer protection from direct sunlight. - Lighting levels must accord with animals' natural cycles - Must allow for observation of animals. - Adult animals are not kept individually. - Animals can see others of their species. - Excrement is removed at least daily if kept inside or at least weekly if the animals are kept outside. - Fur animal must be accustomed to handling by people from birth. 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Floor of housing must be at least partially paved. - Must have at least one platform per animal on which an adult animal can lie and stand up and under which an adult animal can stand up. - Must have devices for climbing that do not consist of wire mesh and have holding devices. - Must be equipped with tunnels. - Must include a swimming pool with of at least 1m² and 30cm deep. <p>Minimum dimensions, in addition to nest box and swimming pool: 1.7m width, 1.7m length, 1m height.</p>	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be mounted in an elevated position and have a main chamber and an antechamber which hides the entrance to the main chamber. - Must have at least 2m² for digging and draining of excretions - Must have at least one platform per animal on which an adult animal can lie and sit upright and under which an adult animal can sit upright. - Must be equipped with tunnels. <p>Minimum dimensions in addition to nest box:</p>	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be equipped with tunnels - Must have at least one platform per animal - Must have a sand bath filled with quartz-free sand with an area of at least 250cm² <p>Minimum dimensions in addition to nest box and sand bath: 1m width, 1m length, 1m height</p> <ul style="list-style-type: none"> - Area should be increased by 0.5m² for each additional animal

	Cage Requirements - Cages must not be kept on top of each other - Animals must have access to behavior-appropriate environmental enrichment outside of the nest box <i>Nest box:</i> - Must have separate area with solid walls where all animals can rest at the same time - Opening is positioned so that newborn animals are restrained, and adult animals have easy access - Must have hay, straw or another suitable material to ensure animals can keep the nest box warm with their body heat	- Area should be increased by 1m ² for each additional animal.	3.46m width, 3.46m length, 1.5m height - Area should be increased by 3m ² for each additional animal	
--	---	---	--	--

¹ Chinchillas are not mentioned in the Animal Care Codes of Practice Regulation, nor is there a Code of Practice for chinchilla care established by the National Farm Animal Care Council.

² In January 2019 the Swedish Board of Agriculture (SBA) concluded a study on whether mink in the fur industry live in conditions compliant with the *Animal Welfare Act*. The findings of the study were inconclusive, but the SBA noted positive changes in mink welfare since their regulations were established.

³ The welfare requirements on the keeping of farmed foxes has made fox fur farming economically unviable within Sweden.

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Withheld pursuant to/removed as

s.12 ; s.13

Page 038 of 292 to/à Page 042 of 292

Withheld pursuant to/removed as

s.12 ; s.13 ; s.14

A/ED Report Out

From: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>
To: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Sent: August 20, 2021 4:28:02 PM PDT

Welcome back Ardice. Hope you had a great time off.

Some Matters of Note from the last 4 days:

Divisional Exec Meeting

a. Media Issues

- Listeria at a peach packer plant (Gavin Lead)
- Dioxin in milk, found in random broad spectrum testing of milk by CFIA (Ursula Lead)
- DM mink letter to producers to go out next week after review by solicitor (JLM Lead)

b. Telework Agreements – JLM sent out ADM considerations one-pager which can be shared with staff, staff with outstanding mandatory training will not be considered for telework agreement (Jackie is the only one in the branch with an outstanding IM 117 and she is getting this done today).

Invoices EA approval

Yulianna sent a number of EA approvals but I will send them on to you since I have no awareness of these projects.

Mink

s.12; s.13

Thanks,

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

Page 044 of 292 to/à Page 047 of 292

Withheld pursuant to/removed as

s.13



2021-08-26

File: 0280-30

Ref: 195809

[ADDRESSEE]

Dear [ADDRESSEE]:

Thank you for your continued efforts to respond to the threat of SARS-CoV-2 on mink farms. We greatly appreciate your willingness to work with the Ministry of Agriculture, Food and Fisheries (the Ministry) and public health organizations to help prevent the spread of COVID-19.

As you are aware, on July 26, 2021, the B.C. Provincial Health Officer (PHO), Dr. Bonnie Henry, issued an order under the *Public Health Act* prohibiting the opening of new mink farms and requiring a cap on the number of animals on existing farms. Subsequently, the Ministry released an Information Bulletin noting a review of the sector is ongoing. This work draws on a June 2021 Rapid Qualitative Risk Assessment (the Risk Assessment) by the B.C. Centre for Disease Control (CDC), led by a multi-jurisdictional expert group. This group evaluated the risk of emergence of a variant of interest (VOI) from an infected mink herd, spreading in the general population and potentially becoming a variant of concern (VOC) for public health. To prevent a risk to public health, the Risk Assessment outlined several virus mitigation strategies that should be undertaken on farms. The mitigation strategies are as follows:

Mink

- Vaccination of mink against SARS-CoV-2
- Ongoing environmental testing
- Mandatory clinical reporting of the herd symptoms and mortality
- Mortality testing
- Ongoing live animal testing

.../2

Workers

- Farm workers are fully vaccinated

**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 Fl, 545 Superior Street
Web Address: <http://gov.bc.ca/agri/>

- Continued use of personal protective equipment (PPE) and other work procedures (e.g., use of mask in common indoor areas while at work for any work, in break, or while working with mink regardless of area and distancing)
- Workers to abstain from working if they present with COVID-19 symptoms

Several assumptions influence the Risk Assessment. These assumptions relate to the continued presence of SARS-CoV-2 in society and the mitigation strategies adopted to respond to the virus. Changes to the assumptions may impact the risk to public health and the mitigation strategies that are necessary.

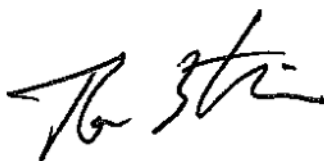
The Ministry is concerned about the threat that mink SARS-CoV-2 variants pose to public and animal health. Therefore, further regulatory amendments may be needed to ensure continued compliance with the Risk Assessment or future assessments and to reduce impacts to human health from mink SARS-CoV-2 variants.

While some of the threats to public health posed by mink farms are currently addressed by the PHO order, the order is timebound, with the expiration scheduled for January 31, 2022. As SARS-CoV-2 is likely to become endemic to society, it may be necessary for government to amend the regulation, or to implement other measures including a complete ban on mink farming, to protect public health.

As a result, the Ministry is currently exploring potential amendments to the Fur Farm Regulation, including a ban on mink farming in B.C. The purpose of this letter is to advise the industry that the Ministry's current policy with respect to mink farming is being evaluated.

The Ministry will be scheduling a meeting with industry representatives to discuss this letter and the next steps in the policy review. If you have any comments, questions, or concerns, please do not hesitate to reach out to Ardice Todosichuk, A/Executive Director of Corporate Policy and Priorities Branch, at Ardice.Todosichuk@gov.bc.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Ethier', with a stylized flourish at the end.

Tom Ethier
Deputy Minister

Contact Info to mink industry

From : Yawney, Lauren AFF:EX s.15
To: Yawney, Lauren EN s.79

Cc: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>, Chai, Shauna-Lee AFF:EX <Shauna-Lee.Chai@gov.bc.ca>, Derek Sturko <dereksturko@innerharbourconsulting.com>, Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Sent: August 30, 2021 3:43:22 PM PDT

Hello everyone,

Thank you for meeting with myself and my colleagues this morning. As requested, below please find the contact information for everyone invited to the meeting.

AFF:
Ardice Todosichuk, A/Executive Director of Corporate Policy and Priorities Branch, ardice.todosichuk@gov.bc.ca
Arlene Anderson, Director of Legislation, arlene.anderson@gov.bc.ca
Shauna-Lee Chai, A/Executive Director of the Plant and Animal Health Branch, shauna-lee.chai@gov.bc.ca
Lauren Yawney, Senior Legislation Analyst, lauren.yawney@gov.bc.ca
Derek Sturko, Consultant, dereksturko@innerharbourconsulting.com

Industry:
s.79

Thank you,
Lauren
Lauren Yawney, MA
Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries
(236) 478-3443

KBernemann - Q re Ministry name

From: Yawney, Lauren AFF:EX^{s.15}
:
To: Yawney, Lauren EN>
To: s.79
Sent: September 1, 2021 2:51:07 PM PDT
Hjs.79

No, we are not changing the name of the Ministry. The "and Mink Producers" part of the meeting title is to signify that the meeting is between the Ministry and the mink producers. I apologize for the confusion!

Thank you,
Lauren

Lauren Yawney, MA

Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries
(236) 478-3443

From:s.79

Sent: September 1, 2021 2:33 PM

To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>; Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>; Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Chai, Shauna-Lee AFF:EX <Shauna-Lee.Chai@gov.bc.ca>; Gunvaldsen, Rayna AFF:EX <Rayna.Gunvaldsen@gov.bc.ca>; Derek Sturko <dereksturko@innerharbourconsulting.com>;s.79

s.79

Subject: Re: Ministry of Agriculture, Food and Fisheries and Mink Producers - Science Presentation

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

Good Afternoon Lauren,

Correct me if I'm wrong, It is "MINISTRY OF AGRICULTURE, FOOD AND FISHERIES" . Are you changing the name?

s.79

On Wednesday, September 1, 2021, 10:11:49 a.m. PDT,^{s.79}

wrote:

Dear Lauren -

Thank you for your email. One of our presenters is away until the 12th, can we schedule something after that date?

Best,

s.79

Get [Outlook](#) for iOS

From: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>

Sent: Wednesday, September 1, 2021 1:09:39 PM

To: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>; Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Chai, Shauna-Lee AFF:EX <Shauna-Lee.Chai@gov.bc.ca>; Gunvaldsen, Rayna AFF:EX <Rayna.Gunvaldsen@gov.bc.ca>; Derek Sturko <dereksturko@innerharbourconsulting.com>;

s.79

Subject: Ministry of Agriculture, Food and Fisheries and Mink Producers - Science Presentation

When: Thursday, September 9, 2021 1:00 PM-2:00 PM.

Where: Skype Meeting

Good morning everyone,

Thank you for meeting with myself and my colleagues on Aug. 30th to discuss the issues regarding SARS-CoV-2 and mink farming. As was decided at that meeting, we are scheduling this meeting to provide you the opportunity to present your science on the risks of SARS-CoV-2 and mink farming, and the virus mitigation measures you are undertaking for both mink and mink farm workers. To inform your presentation, our main concerns are the mitigation measures listed in the letter (attached for your convenience), specifically:

Mink

- Vaccination of mink against SARS-CoV-2
- Ongoing environmental testing
- Mandatory clinical reporting of the herd symptoms and mortality
- Mortality testing
- Ongoing live animal testing

Workers

- Farm workers are fully vaccinated
- Continued use of personal protective equipment (PPE) and other work procedures (e.g., use of mask in common indoor areas while at work for any work, in break, or while working with mink regardless of area and distancing)
- Workers to abstain from working if they present with COVID-19 symptoms

If you could please explain how you will address these concerns in your presentation, that would be very helpful.

Additionally, we are currently working on getting the CDC Risk Assessment to you. We will send the risk assessment at a later date, but wanted to schedule the meeting now to give you ample time to prepare.

If you have any questions prior to the meeting, please feel free to contact myself or Ardice Todosichuk.

Thank you,

Lauren

Lauren Yawney, MA

Senior Legislation Analyst

Join Skype Meeting

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Local - Vancouver: +1 (604) 398-9304, ^{s.15}	# (BC, Canada)	English (United States)
Toll-Free: +1 (888) 952-9304, ^{s.15}	# (BC, Canada)	English (United States)
Local - Kamloops: +1 (250) 554-7244, ^{s.15}	# (BC, Canada)	English (United States)
Local - Prince George: +1 (250) 645-9304, ^{s.15}	# (BC, Canada)	English (United States)
Local - Nelson: +1 (778) 671-9304, ^{s.15}	# (BC, Canada)	English (United States)
Local - Fort Nelson: +1 (250) 233-7000, ^{s.15}	# (BC, Canada)	English (United States)

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Conference ID:^{s.15}

[Forgot your dial-in PIN?](#) [Help](#)

RE: Meeting with mink producers

From: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>, Singal, Mayank [BCCDC] <mayank.singal@bccdc.ca>, Dhudwal, Amrit (Amy) [FH] <Amrit.Dhudwal2@fraserhealth.ca>, Burkett, Christy [FH] <Christy.Burkett@fraserhealth.ca>, Gunvaldsen, Rayna AFF:EX <Rayna.Gunvaldsen@gov.bc.ca>
Sent: September 1, 2021 5:17:08 PM PDT

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

Hi Lauren,

Thanks, that's very helpful. I can make the new date/time – please send an invite when ready.

Regards,
Emily

Emily Newhouse, MD, MPH, FRCPC
Medical Health Officer
Fraser Health

Administrative assistant:
Christy Burkett
Ph: 604-930-5405, ext 765638
christy.burkett@fraserhealth.ca

From: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Sent: Wednesday, September 01, 2021 5:03 PM
To: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Singal, Mayank [BCCDC] <mayank.singal@bccdc.ca>; Dhudwal, Amrit (Amy) [FH] <Amrit.Dhudwal2@fraserhealth.ca>; Burkett, Christy [FH] <Christy.Burkett@fraserhealth.ca>; Gunvaldsen, Rayna AFF:EX <Rayna.Gunvaldsen@gov.bc.ca>
Subject: RE: Meeting with mink producers

EXTERNAL SENDER. If you suspect this message is malicious, please forward to spam@phsa.ca and **do not** open attachments or click on links.

Hi Emily,

Thank you very much for your response. The meeting has actually been changed to Sept 13th at 10-11 am to accommodate the industry's presenters. I hope that time works for you and Dr. Singal.

We are not expecting you or Dr. Singal to provide commentary at the meeting. As you mentioned, we would like your participation only so that you can provide AFF with analysis and context on the claims made, as none of us have medical expertise. Dr. Gunvaldsen will be attending for the same purpose for an animal health perspective.

The purpose of the meeting is for the producers and their stakeholders to provide their science regarding the risk posed by mink farming and SARS-CoV-2, and the mitigation measures they are taking. We have raised specific mitigation measures that we are wanting the mink producers to explain how they will address, which were taken from the BC CDC Joint Risk Assessment on Mink. The measures are as follows:

Mink

- Vaccination of mink against SARS-CoV-2
- Ongoing environmental testing
- Mandatory clinical reporting of the herd symptoms and mortality
- Mortality testing
- Ongoing live animal testing

Workers

- Farm workers are fully vaccinated
- Continued use of personal protective equipment (PPE) and other work procedures (e.g., use of mask in common indoor areas while at work for any work, in break, or while working with mink regardless of area and distancing)
- Workers to abstain from working if they present with COVID-19 symptoms

During our previous meeting the industry referenced studies regarding the chances of spread of SARS-CoV-2 between mink and humans, and the risk of mink variants arising. I imagine similar points will be made during this meeting, and this is an area where your expertise would be greatly appreciated.

Please let me know if you have any questions, and if the new date works for you.

Thank you and have a great evening,
Lauren

Lauren Yawney, MA

Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries
(236) 478-3443

From: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>

Sent: September 1, 2021 4:49 PM

To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>

Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Singal, Mayank [BCCDC] <mayank.singal@bccdc.ca>; Dhudwal, Amrit (Amy) [FH] <Amrit.Dhudwal2@fraserhealth.ca>; Burkett, Christy [FH] <Christy.Burkett@fraserhealth.ca>

Subject: RE: Meeting with mink producers

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Including Amy and Christy for scheduling purposes.

Emily Newhouse, MD, MPH, FRCPC
Medical Health Officer
Fraser Health

Administrative assistant:
Christy Burkett
Ph: 604-930-5405, ext 765638
christy.burkett@fraserhealth.ca

From: Newhouse, Emily [FH]

Sent: Wednesday, September 01, 2021 4:48 PM

To: 'Yawney, Lauren AFF:EX' <Lauren.Yawney@gov.bc.ca>

Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Singal, Mayank [BCCDC] <mayank.singal@bccdc.ca>
Subject: RE: Meeting with mink producers

Hi Lauren,

I do have some availability on Sept 7th – I can try to join if it fits in my calendar. The other person who is worth inviting is Dr. Mayank Singal from BCCDC (cc:ed). He is the provincial public health zoonotic diseases lead.

Can you share any further details about what you anticipate being the main points of discussion, or whether I'll be asked to comment on any particular issues during the meeting? Or are you just hoping that I can be there to listen to the producers' perspective and claims, and then provide additional analysis and context in follow-up discussions with MAFF?

Regards,
Emily

Emily Newhouse, MD, MPH, FRCPC
Medical Health Officer
Fraser Health

Administrative assistant:
Christy Burkett
Ph: 604-930-5405, ext 765638
christy.burkett@fraserhealth.ca

From: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Sent: Tuesday, August 31, 2021 4:42 PM
To: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Subject: Meeting with mink producers

EXTERNAL SENDER. If you suspect this message is malicious, please forward to spam@phsa.ca and **do not** open attachments or click on links.

Hello Dr. Newhouse,

I am a Senior Legislation Analyst with the Ministry of Agriculture, Food and Fisheries, and I have been working on the issue of mink farming and SARS-CoV-2. The Ministry is currently engaged in discussions with mink producers on the threats to public health posed by SARS-CoV-2 outbreaks on mink farms. In our next call with producers, we are providing them with the opportunity to present their findings regarding the public health threats posed by mink farming and the virus mitigation measures they are taking. We would like to have someone with a health perspective/training present on the next call, as myself and my colleagues do not have the knowledge to be able to speak to any health claims or concerns. Dr. Gunvaldsen suggested that you would be an individual who may be able to participate, or have a suggestion on someone else who would be able to.

The next producer meeting is tentatively scheduled for Sept. 7th – would you be able to participate, or do you have a suggestion of someone else who would be knowledgeable on the subject?

Please let me know if you have any questions.

Thank you,
Lauren

Lauren Yawney, MA
Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries

Re: Mink farmer meeting

From: s.79
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Sent: September 3, 2021 8:27:04 AM PDT

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

Sorry, I was forwarded the phone-in number for the Aug 30th meeting and then added to your emailing list. Do you not have a current email address for the BC mink producers? My conversations generally are by phone and not so much emailing. s.79 not always in contact. I'm sure s.79

On Thu, Sep 2, 2021, 4:20 PM Yawney, Lauren AFF:EX, <Lauren.Yawney@gov.bc.ca> wrote:

Hi s.79

Thank you for your email. Would you be able to send me the names and (if possible) contact information for the individuals not currently invited who should be?

Thank you,

Lauren

Lauren Yawney, MA

Senior Legislation Analyst

Corporate Policy and Priorities Branch

Ministry of Agriculture, Food and Fisheries

(236) 478-3443

From: s.79
Sent: September 2, 2021 2:34 PM
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Subject: Mink farmer meeting

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

Thank you for adding me to the email list. Being in the^{s.79} I have not been invited to any of the discussions with Fraser Health and on the on going concerns with covid. I have been kept in the "loop" and somewhat up to date, but an invite is still appreciated. I look forward to the upcoming meetings.

....on another note, many people at the Aug 30th meeting dont seem to have been invited to this one. Speaking with some fellow ranchers the seemed clueless as to this upcoming meeting

Again, thanks for the invite.

s.79

Re: Risk Assessment report

From: s.79
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Sent: September 7, 2021 9:24:52 AM PDT

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

Thank you. Received.

s.79

On Sep 7, 2021, at 08:34, Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca> wrote:

Hi s.79

Ardice forwarded me your email to get the Risk Assessment for you. Attached please find the BC CDC Risk Assessment.

Please note that while the Risk Assessment is dated June 30th, it can be revised at any time.

Thank you,
Lauren

Lauren Yawney, MA
Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries
(236) 478-3443

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

From: s.79
Sent: August 30, 2021 1:12 PM
To: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Cc: s.79

s.79

Subject: Risk Assessment report

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

Hello Ardice.

Could we please get a copy of the Risk Assessment Report please? What was the date of this report?

I have added s.79 into the thread.

s.79

<Joint_RQRA_MINK SARS-CoV-2 Final_ June 30th.docx>
<Hazard Profile J-RQRA_SARS-CoV-2 Final June 30.docx>

MINK INDUSTRY SCIENTIFIC PRESENTATION
SEPTEMBER 13, 2021

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FW: Mink Industry Response to August 26, 2021 Letter to BC Mink Farmers

From: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>, Derek Sturko
<dereksturko@innerharbourconsulting.com>, Newhouse, Emily Dr. HLTH:IN
<Emily.newhouse@vch.ca>, Anderson, Arlene AFF:EX
<Arlene.Anderson@gov.bc.ca>, Chai, Shauna-Lee AFF:EX <Shauna-
Lee.Chai@gov.bc.ca>, Gunvaldsen, Rayna AFF:EX
<Rayna.Gunvaldsen@gov.bc.ca>
Sent: September 10, 2021 12:20:49 PM PDT
Attachments: image003.jpg, Industry Response to August 26th Letter.pdf
FYI

From:s.79

Sent: September 10, 2021 12:13 PM

To: Ethier, Tom AFF:EX <Tom.Ethier@gov.bc.ca>

Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; derksturko@innerharbourconsulting.com;
s.79

s.79

s.79

Subject: Mink Industry Response to August 26, 2021 Letter to BC Mink Farmers

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On behalf of the s.79

s.79 please find attached their response to the August 26, 2021
letter issued by the Ministry of Agriculture to British Columbia mink producers.

Should you require additional contact information please don't hesitate to contact me.

s.79

Tom Ethier
Deputy Ministry of Agriculture
Ministry of Agriculture, Food & Fisheries
P.O. Box 9120
Station Provincial Government
Victoria, BC
V8W 9B4

September 10, 2021

Re: Industry Response to August 26th Letter to BC Mink Farmers

Dear Mr. Ethier;

This letter is in response to the letter issued by the Ministry of Agriculture to all British Columbia mink producers on August 26th, 2021.

Should we have been provided the “Public Health Risk Assessment” and “Hazard Profile” prior to the August 30, 2021 zoom meeting, we would have been able to comment directly to the findings of these reports. After receiving and reviewing these documents, we hold the opinion that they contain all the information needed to conclude that mink farming presents a low risk to Public Health. We do object to the absence of including a ‘Mink Expert’ as a participant on the ‘expert group panel’ conducting the assessment.

As B.C. Mink Farmers we would like to add to the discussion the following points of information:

Ever since Covid-19 was first detected on European mink farms, BC mink producers have implemented heightened biosecurity on their farms. The biosecurity protocols implemented were specific to Sars-CoV-2 and were developed with the guidance of the *Canadian Food Inspection Agency*.

Since the initial detection of Sars-CoV-2 on a British Columbia mink farm, producers have worked closely with the Ministry of Agriculture as well as Public Health officials to implement even more intensive biosecurity measures to contain the farm outbreaks, prevent additional outbreaks, protect their animals and safeguard the health of their families, employees and the public. This is acknowledged in your August 26, 2021 letter to British Columbia mink producers.

This letter also outlined the mitigation strategies defined in the Risk Assessment conducted subsequent to the July 26th, 2021 Public Health Order. These strategies are as follows:

- Vaccination of mink against Sars-CoV-2 (providing that vaccine is available)
- Ongoing environmental testing
- Mandatory clinical reporting of herd symptoms and mortality
- Mortality testing
- Ongoing live animal testing

- Farm workers fully vaccinated
- Continued use of Personal Protective Equipment (PPE) and other work procedures
- Workers to abstain from working if they present with Sars-CoV-2 symptoms

With the exception of mink vaccination, all of these mitigation strategies, in addition to strict biosecurity measures, were implemented by BC mink producers with a significant commitment of time and money – during a very busy farming season and in spite of difficult financial circumstances.

Regarding mink vaccination, Zoetis, the world's largest producer of animal vaccines, has successfully developed a Sars-CoV-2 vaccine for mink. The industry has been working very closely with Zoetis to secure a supply for Canadian mink farms. It is anticipated that this vaccine will be available to the BC mink producers by December 2021.

The *US Centre for Disease Control & Prevention*, the *US Drug Administration*, the *US National Veterinary Services Laboratory* and the *European Centre for Disease Control & Prevention* along with other agencies and veterinarians provide assurances that with the implementation of proper biosecurity protocols, including the use of PPEs, the risk that farmed mink pose to spread of Sars-CoV-2 is very low.

The *World Organization for Animal Health* does not propose mass culling of mink herds, let alone an end to mink farming. Rather it advises a range of preventative measures including human testing; infection prevention and control for workers; animal testing and prevention of spread from animals; and the development of preparedness and response strategies. These are precisely the precautions that BC mink producers have implemented.

Mink farming is very different in British Columbia than in Denmark, where the government ordered mass culling of mink. In Denmark there were 1100 farms densely situated on an area the size of Vancouver Island, producing more than 17 million mink. In British Columbia there are only 8 mink farms producing a total of 250,000 mink. The small number of farms and distances between farms greatly reduces the risk of contagion.

After many of the mink in Denmark had already been destroyed, the Danish government suspended the directive over the legality of such a move and in the face of scientific evidence which demonstrated that the risk to human and animal populations could be managed effectively on the farm. The Danish Minister of Agriculture was forced to resign over the premature reaction and culling strategy.

The financial burden that Denmark is currently faced with through compensation for farmers, industry manufacturers and suppliers is tremendous.

All other countries that have experienced Sars-CoV-2 infections on mink farms have implemented quarantine and monitoring policies as well as adherence to strict biosecurity protocols to prevent further spread of the virus. The US has experienced 20 Sars-CoV-2 infected farms and have successfully managed the situation through this approach. No other countries have taken the same extreme and devastating measures as Denmark.

To date all Sars-CoV-2 variants prevalent in the human population have originated from countries where there is no mink production.

Research has shown that several other mammal species can also contract Sars-CoV-2 including ferrets, hamsters and cats – all animals that live in our homes. A recent study by the *USDA* found that thirty-three percent of the white-tailed deer tested in four US states contained Sars-CoV-2 antibodies. White tailed deer are abundant in certain parts of British Columbia. What approach will the government take to protect the public in this situation?

When outbreaks of other zoonotic diseases such as Swine flu (H1N1) and Avian Flu occurred, government did not propose (or even consider) the banning of these industries. Rather, government authorities worked with the farmers and supported them in efforts to mitigate risk. The BC mink producers expect the same consideration and respect as members of the agricultural community.

The British Columbia mink industry impacts ^{s.79} The majority of the farms
ares.⁷⁹ and are significant contributors to their community's economy. Forty percent of
the mink raised in British Columbia are raised on farms s.⁷⁹

Historically the mink industry has endured the ebb and flow of a demand and supply economy. BC Mink Producers have come through 8 years of difficult pricing, which was driven by an imbalance in global supply and market demand of mink pelts. In addition to this, farmers have had to invest heavily in new housing and pen enrichments to meet Code of Practice requirements. And they recently invested again to provide the assurances needed that they do not pose a Sars-CoV-2 threat to the public.

The market is now recovering. The global demand for natural sustainable fur remains strong, and the over-supply has been corrected. After enduring almost a decade of financial challenges, BC mink producers are presented with an opportunity to prosper again. Mink pelt prices and clearance levels are high and the future looks extremely promising.

This sector consumes the waste stream from the food processors as well as fish and livestock facilities. Without BC mink producers, much of this material will have to be discarded in landfills or disposed of in another manner. These disposal methods come with not only a financial cost - but also an environmental cost.

Mink farming by-products are recycled into biofuel or returned to the earth as high quality fertilizer.

At a time when the world is focused on reducing fossil fuels as well as land and water pollution, long-lasting and biodegradable natural fur is a responsible alternative to fast-fashion plastic clothing.

The discovery that mink are susceptible to Sars-CoV-2 has given renewed energy to animal activists. Their messaging resonates with a fearful public who do not have the facts.

While mink farming has always been the low hanging fruit, their goal is to ban leather, wool, and any other natural material that comes from an animal – as well as meat. Other agricultural commodities are, or will, experience similar challenges.

Animal activists are taking away the consumer's right to choose. In this case, the right to choose a more sustainable product.

Animal welfare is a priority on Canadian mink farms. Producers work hard to provide their animals with excellent nutrition and care. This is the only way to produce the high-quality fur for which Canada is known.

Like other animal agriculture, Canadian mink farmers follow Codes of Practice that were developed by veterinarians, animal scientists and animal welfare authorities under the guidance of the *National Farm Animal Care Council*. Our farms undergo annual third party inspections to ensure Code compliance. All BC mink farms are certified.

BC mink producers support Public Health initiatives to keep the public safe.

There is concern, however, that the threat of a risk to Public Health is being used to amend the regulations with the end goal of banning mink farming in British Columbia for political reasons.

As licenced and regulated farmers in BC under the "Animal Health Act" and recognized as an agriculture commodity in Canada, BC mink producers have a right to farm. And consumers have the right to choose a more sustainable product. We expect our democratic government to make decisions based on facts.

Any change to the existing BC Fur Farm Act that would affect the **normal cycle of mink production** would have a devastating and broad reaching impact. The implications of such a drastic decision must be carefully considered.

In closing, BC Mink Farmers can be available to discuss or provide additional information that you may require. All communication should be directed to the BC Mink Producers Association, as opposed to individual producers. BC Mink Producers will also be working closely with our national association, CMBA, and the International Fur Federation (IFF).

Sincerely;

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Withheld pursuant to/removed as

s.13

Mink BC Presentation Final Version

From: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>, Derek Sturko <dereksturko@innerharbourconsulting.com>, Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>, Gunvaldsen, Rayna AFF:EX <Rayna.Gunvaldsen@gov.bc.ca>, Chai, Shauna-Lee AFF:EX <Shauna-Lee.Chai@gov.bc.ca>, emily.newhouse@fraserhealth.ca
Sent: September 13, 2021 11:28:17 AM PDT
Attachments: image003.jpg, BC Science Presentation -Final Version September 13, 2021.pptx

FYI

From:s.79

Sent: September 13, 2021 10:05 AM

To: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>

Subject: Fw: BC Presentation Final Version

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

From:s.79

Sent: September 13, 2021 7:57 AM

To:s.79

s.79

Subject: BC Presentation Final Version

Good morning everyone

Please find attached the final version of the BC Science Presentation.

An effort was made to use pictures of people and families to emphasize the human side of the industry.

s.79 - Thanks for all your help with this!

s.79 - Thanks for agreeing to help with sharing the presentation through Skype if I run into difficulties.

Regards,

s.79

Page 122 of 292 to/à Page 124 of 292

Withheld pursuant to/removed as

s.13

Fwd: Fur farming transition

From: Godfrey, Sam AFF:EX <Sam.Godfrey@gov.bc.ca>
To: Ethier, Tom AFF:EX <Tom.Ethier@gov.bc.ca>, Popham, Lana AFF:EX <Lana.Popham@gov.bc.ca>
Sent: September 15, 2021 7:44:23 AM PDT
Attachments: DN195460 proposed fur farm regulation amendments (2).docx, APPENDIX B DRAFT Joint_RQRA_MINK SARS-CoV-2 Final_June 30th.pdf, APPENDIX D Mink Farming Policy Analysis.pdf

Sent from my iPhone

Begin forwarded message:

From: "Godfrey, Sam AFF:EX" <Sam.Godfrey@gov.bc.ca>
Date: September 14, 2021 at 2:07:14 PM PDT
To: "Meggs, Geoff PREM:EX" <Geoff.Meggs@gov.bc.ca>
Cc: "Sanford, Donna L PREM:EX" <Donna.Sanford@gov.bc.ca>
Subject: Fur farming transition

Hi Geoff,

I'm looping in Donna here as she and I touched base on this earlier today. The Minister has approved the recommended option^{s.13} in the attached) and the timeline is tight given the expiry of the PHO order and the annual mink breeding cycle. Staff had planned for this to go to ELUC this month but were told there wasn't time available. Hoping for some input on how to advance this file. Thanks, S.

Sam Godfrey
Senior Advisor to the Honourable Lana Popham
Minister of Agriculture, Food and Fisheries. British Columbia
Mobile: 250 208 1359 | Office: 250 387 1023
Rm 327, Parliament Buildings,
501 Belleville St., Victoria, BC, CAN, V8W 1X4

I respectfully acknowledge this Office is situated on the traditional territory of the Esquimalt and Songhees First Nations.

Pursuant to the Freedom of Information and Protection of Privacy Act, do not disclose the contents of this message or any attachment(s) without prior written consent from the sender. If you are not the intended recipient please notify the sender by reply email, and fully delete.

Ministry of Agriculture, Food and Fisheries
BRIEFING NOTE FOR MINISTER FOR DECISION

Ref: 195460

Date: August 3, 2021

Title: Proposed Fur Farm Regulation amendments

Issue: Need to codify the recent Provincial Health Officer (PHO) Order in legislation.

Background:

Substantive background information can be found in CLIFF 194646 (Appendix A)

On July 26, 2021 the British Columbia (B.C.) PHO Dr. Bonnie Henry issued an order under the *Public Health Act* prohibiting the opening of new mink farms and requiring a cap on the number of animals on existing farms. Subsequently, the Ministry of Agriculture, Food and Fisheries (AFF) released a statement stating that the Ministry is undertaking amendments to the Fur Farm Regulation to ensure enduring compliance with health protection strategies outlined in the June 29, 2021 Public Health Risk Assessment of Farmed Mink report (Appendix B).

Concerns regarding the spread of the SARS-CoV-2 virus in mink farms and the impact of a mutated virus on vaccines have led to calls for mink culls and an end to mink and fur farming internationally. Culls of animals on infected farms have occurred in the Netherlands, France, Spain, and Poland, with Denmark culling all mink in the country. Public opposition to fur has also led to the creation or promise of fur farming bans in several countries (see Appendix A).

Prior to the COVID-19 pandemic, the fur farming industry has been in a general decline internationally. In B.C., the number of mink farms decreased from 17 licensed farms and 14 licensed operators in 2016 to 13 mink farms and seven operators in 2021. There are 9 operating mink farms, each employing between one and 30 employees. Employees are generally domestic workers, with 5 temporary foreign workers currently on farm. All the farms are on privately owned parcels of Agricultural Land Reserve (ALR) land, and none are on First Nations land.

Mink production in B.C. has been inherently unprofitable for the last several years. Pelt prices have been inadequate to cover operating costs (e.g. feed, labour) for most mink producers. Based on data developed in support of the AgriStability program and taken from established sources (e.g. StatsCan, USDA) average market prices for pelts dropped from a high in 2011 of \$97.07 to a low of \$26.51 in 2020. The price had trailed off to a low of \$18.70 in December 2020; however, there is likely a significant amount of 2020 production which has not yet been marketed. The closure of normal auction events and a need for cashflow and shortage of storage space may have contributed to very low prices late in the year. Prices are volatile year

to year but there has been a general decline in the demand and prices of mink pelts for several years.

A small number of North American pelts were sold at the Copenhagen fur action in April of 2021 at an average price of \$35.91; these would be pelts produced in 2020. It is unknown if this is a return to more normal prices spurred on by reduced production from Denmark culling all their mink, or if this is an anomaly from a small sales volume offseason from the bulk of normal sales. Additional auctions will need to be observed to establish a reasonable estimate of current prices. Public opposition to fur farming continues for both health and animal welfare reasons, which may impact demand.

The farmed fur industry has experienced considerable market declines in recent years. The increasing public opposition to the use of fur has prompted designer brands such as Chanel, Gucci, Burberry, Versace, Coach, Michael Kors, Jimmy Choo, Ralph Lauren, and others to ban the use of fur in their designs. The use of fur is also banned in more affordable brands such as ASOS, Gap, H&M, J. Crew, Macy's, Topshop, and Urban Outfitters. Even Canada Goose, a brand infamous for use of coyote fur on their parkas, has announced its intention to stop using real fur by 2022.

There is broader trend in society towards increased welfare considerations for animals used for human purposes. In the U.S. there have been increased regulations on the use of animals in scientific testing, as well as bans on farm practices such as the use of gestation crates in swine production. There is a large market for cruelty-free and vegan cosmetics products, with the cruelty-free cosmetics industry estimated to be worth \$10 billion USD by 2024. In B.C., the Ministry has received large amounts of correspondence from multiple groups and individuals calling for an end to mink farming, and fur farming more generally, in the province. Following the first B.C. mink farm SARS-CoV-2 infection, the B.C. Society for the Prevention of Cruelty to Animals (B.C. SPCA) publicly called for an end to fur farming in B.C. A survey referenced by the B.C. SPCA suggests that 85% of B.C. respondents are opposed to fur farming.

s.14

First Nations Considerations:

Under the modern treaty agreements, B.C. is required to notify each of the Treaty First Nations of proposed legislation if the respective Final Agreement provides that Treaty First Nation Government with law making authority in respect of the subject matter of the legislation. The Tsawwassen, Maa-nulth and Tla'amin Final Agreements all have law-making authority related to the regulation of business and land, which is the most analogous to the regulation of mink farming. None of the existing mink fur farms are located on First Nations lands, however, the amendments prohibit future fur farms, which could include farms located

on those lands. Therefore, the treaty requirement to notify the Treaty First Nations is likely triggered.

Additionally, the duty to consult Indigenous Peoples is triggered when contemplated Crown conduct has the potential to adversely affect asserted or proven Aboriginal rights, title, or treaty rights (Section 35 Rights). Aboriginal title includes the right to decide how the land will be used and includes the economic benefits of that land. As the prohibition on mink farming limits a particular use of land that an Aboriginal title holder may choose in the future, the proposed regulation could constitute an adverse effect on s. 35 Aboriginal title sufficient to trigger the duty to consult.

s.12; s.13; s.16

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s.12 ; s.13 ; s.16

Approved / Not Approved

LANA POPHAM, Minister

Date Signed

Contact: Lauren Yawney, Senior Legislative Analyst, 236 478-3443

DIR AT

ADM

A/DM JLM

Attachments:

APPENDIX A: CLIFF 194646

APPENDIX B: June 29, 2021 Public Health Risk Assessment of Farmed Mink report

APPENDIX C: Timeline for implementation

APPENDIX D: Mink Farming Policy Analysis

APPENDIX A

Ministry of Agriculture, Food and Fisheries BRIEFING NOTE FOR MINISTER FOR DECISION

Ref: 194646

Date: May 26, 2021

Title: Continuation of Fur Farming in B.C. with ongoing COVID presence

Issue: Outbreaks of SARS-CoV-2 in populations of farmed mink, increased risk to human health from virus mutations and prevalence of COVID in B.C., and long-term viability of fur farming with ongoing COVID presence

Background:

Fur farming has become an issue of increasing public concern. Due to the SARS-CoV-2 outbreaks on Fraser Valley mink farms, on December 14, 2020 the B.C. Society for the Prevention of Cruelty to Animals (BCSPCA) issued a media release condemning mink farming and calling for an end to the practice in B.C. This release was accompanied by a petition to be brought forward to policy makers. On May 17, 2021, a third Fraser Valley mink farm was put under quarantine due to a SARS-CoV-2 outbreak. In response to this outbreak the BCSPCA released another media statement calling for a ban on fur farming. Public opposition to fur has also led to the creation or promise of fur farming bans in several countries (see Appendix A).

The Ministry of Agriculture, Food and Fisheries (AFF) currently acknowledges and regulates fur farming as an acceptable farm practice in B.C. The legislation governing the industry are the *Prevention of Cruelty to Animals Act*, the Animal Care Codes of Practice Regulation, the *Animal Health Act*, and the Fur Farm Regulation. The regulation of fur farming in B.C. is consistent with other provinces, while approaches to animal welfare regulation varies across provinces.

The fur farming industry has been in a general decline internationally. In B.C., the number of mink farms decreased from 17 licensed farms and 14 licensed operators in 2016 to 11 farms and seven operators in 2020. There is one chinchilla farm and no fox farms currently operating in B.C. The fur farms usually employ between one to 30 employees. Employees are generally domestic workers. See attached Appendix D for detailed information about the economics of the fur farm industry.

Mink are susceptible to catching the SARS-CoV-2 virus from humans, with potential for the virus to mutate in the mink and be re-introduced to humans. Concerns regarding the spread of the virus in farms and the impact of a mutated virus on vaccines have led to calls for mink culls and an end to mink and fur farming internationally. Culls of animals on infected farms have occurred in the Netherlands, France, Spain, and Poland, with Denmark culling all mink in the country.

The Ministry of Health (HLTH) and other agencies are working with the mink industry to implement ongoing human and animal virus surveillance and enhanced COVID-19 safety plans on farms. On February 8, 2021, HLTH estimated there was a low and acceptable risk of a SARS-CoV-2 variant of concern arising at a mink farm, being transmitted to a worker and then to the general population or wildlife, in a way that would significantly threaten the health of the population. This estimate involved a significant degree of uncertainty and assumes that mitigation measures are well implemented, and that industry continues to cooperate with health protocols. HLTH also estimated, with moderate uncertainty, that there is a very low risk of SARS-CoV-2 overflowing from farms, infecting wild animals, and creating a reservoir of ongoing transmission and viral replication.

HLTH risk assessment was provided prior to the increase in SARS-CoV-2 variants of concern and continued high case numbers/third wave in the Fraser Health region. On March 2, 2021, Dr. Emily Newhouse, Medical Health Officer for Fraser Health considered new information and the level of compliance of mink farmers with the COVID safety plans to change the Fraser Health risk assessment from low to moderate risk. An updated risk assessment has been requested from the CDC and Provincial Health Officer and will possibly be completed in June due to pressures on public health from the ongoing third wave of the pandemic. Fraser Health also provided information that Whole Genome Sequencing has identified a mutation of concern in the mink samples (the Y453F mutation); as of March 2, 2021, this mutation has not been linked to any mass outbreaks in humans.

First Nations Considerations:

A ban on fur farming would not impact traditional Indigenous rights to hunting and trapping. Two Indigenous groups have provided perspectives: the Indigenous Trappers of B.C. who support mink farming; and the Union of B.C. Indian Chiefs who oppose mink farming.

Discussion:

There are two key considerations regarding renewed calls to end fur farming in B.C.:

s.12; s.13

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s.12 ; s.13

Approved / Not Approved

LANA POPHAM, Minister

Date Signed

Contact: Lauren Yawney, Senior Legislative Analyst, 236 478-3443

ED AT ADM JLM DM TE

Attachments:

APPENDIX A: Fur Farm Ban Legislation Jurisdictional Scan

APPENDIX B: Jurisdictions which allow and regulate fur farming

APPENDIX C: Fur Animal Welfare Requirements in Legislation

APPENDIX D: Mink Farming Policy Analysis V.2

APPENDIX A (Ref: 194646)

Fur Farm Ban Legislation Jurisdictional Scan

The purpose of this table is to provide an overview of the varying international legislation regarding fur farms.

In addition to the countries outline below, bans on fur farming also exist in Austria, Slovakia, Belgium, Luxembourg, Slovenia, the Republic of Macedonia, Serbia, Bosnia and Herzegovina, the Czech Republic and Hungary, but substantive information on these laws was unable to be found. Legislation on fur farm bans are also being proposed in Bulgaria, Estonia, Lithuania, Montenegro, and Ukraine.

Full Ban Legislation		
Jurisdiction	Information	Info Links
United Kingdom	<p><u>Primary Instrument</u> <i>Fur Farming (Prohibition) Act</i> created in 2000</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Prohibits “the keeping of animals solely or primarily for slaughter for the value of their fur” in England and Wales Allows for the creation of scheme to allow for compensation of individuals for losses as a result of ceasing business In 2002 the practice was prohibited in Scotland with the <i>Fur Farming (Prohibition) (Scotland) Act</i> and Northern Ireland with the Fur Farming (Prohibition) (Northern Ireland) Order The legislation still allows for the import of animal furs from other countries and the sales of some furs <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Once the UK has officially left the EU, the country is considering a total ban on the sale of fur 	<p>Legislation: UK Act https://www.legislation.gov.uk/ukpga/2000/33/contents</p> <p>Scotland Act https://www.legislation.gov.uk/asp/2002/10/contents</p> <p>Northern Ireland Order https://www.legislation.gov.uk/nisi/2002/3151/contents</p> <p>Other Info: https://www.theguardian.com/politics/2020/sep/25/uk-considering-outright-ban-on-fur-sales-after-brex</p>
Norway	<p><u>Primary Instrument</u> <i>Fur Farming Prohibition Act</i> created in 2018</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires all farms to be closed by February 2025 Allows for compensation to farmers for ceasing business <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Norway was once the world’s largest producer of fox pelts, with 20,000 farms in 1939 	<p>Other Info: https://dyrevern.no/dyrevern/breaking-news-norway-bans-fur-farming/</p> <p>https://www.reuters.com/article/us-norway-fur-idUSKBN1F426E</p>
California	<p><u>Primary Instrument</u> Assembly Bill 44, which amended the <i>Fish and Game Code</i></p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> The Bill comes into effect January 2023 	<p>Legislation: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB44</p> <p>Other Info:</p>

	<ul style="list-style-type: none"> Bans the sale and manufacturing of fur products in the state Used fur, fur products used for specified purposes, and any activity expressly authorized by federal law are exempt from the bill Allows for fines of up to \$1,000 for repeated violations <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Statewide ban follows bans of fur sales in Los Angeles and San Francisco 	https://www.theguardian.com/world/2019/oct/13/fur-ban-california-outlaws-making-and-selling-new-products
The Netherlands	<p><u>Primary Instrument</u> <i>Fur Farming Prohibition Act</i> created in 2013</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Banned mink farming with a transition period to phase out farms by 2024 Allows for compensation to farmers for ceasing business Following a COVID-19 outbreak at more than 40 farms, the phase out timeline was brought up to March 2021 Minks at the COVID-19 affected farms were culled in the interest of public health Farmers at the farms unaffected by COVID-19 could slaughter their mink in 2020, but are not allowed to re-stock <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> The Netherlands is the European Union's second largest mink producer Fox and chinchilla fur farming was phased out in the country in the mid-1990s 	<p>Other Info:</p> <p>https://nos.nl/artikel/2345662-kabinet-maakt-eind-aan-nertsenfokkerij-alle-bedrijven-volgend-jaar-dicht.html</p> <p>https://www.hsi.org/news-media/dutch-mink-fur-farms-to-be-permanently-closed/</p>
Croatia	<p><u>Primary Instrument</u> <i>Animal Protection Act</i></p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Legislation initially introduced in 2007 and came into effect in 2017 Provided a ten-year phase out period for existing fur farms prior to full adoption Prohibits the farming and breeding of animals for fur production purposes 	<p>Legislation:</p> <p>http://www.mvep.hr/files/file/dokumenti/prevodenje/zakoni/25-Zakon-o-za%C5%A1titi-%C5%BEivotinja--NN-102-17-ENG.pdf</p>
Bans as an effect of other legislation		
Japan	<p><u>Primary Instrument</u> <i>Invasive Alien Species Act</i> created in 2005</p> <p><u>Key Facts</u></p>	<p>Legislation:</p> <p>https://www.env.go.jp/en/nature/as.html</p>

	<ul style="list-style-type: none"> Bans actions of raising, planting, storing, carrying or importing invasive alien species The American Mink is considered an invasive alien species under the Act, effectively making their farming illegal <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Mink farms built prior to 2006 could continue operation The singular mink farm existing in Japan ceased operation in 2015 after years of animal welfare issues 	<p>Other Info: https://www.furfreealliance.com/japan-makes-end-fur-farming/</p>
Germany	<p><u>Primary Instrument</u> <i>Animal Products Trade Prohibition Act</i> created in 2017</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires strict requirements for keeping animals, such as increased cage sizes and swimming basins for mink Farms permitted to keep operating without adapting to new legislation until 2022 <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> The stricter welfare requirements made fur farming unprofitable The last fur farm in the country closed in 2019 	<p>Legislation: http://www.gesetze-im-internet.de/khfeverbg/BJNR239400008.html#BJNR239400008BJNG000300124</p> <p>Other Info: https://www.tagesspiegel.de/gesellschaft/panorama/pelze-in-der-letzten-deutschen-nerzfarm-sind-keine-tiere-mehr/24151900.html</p>
Sweden	<p><u>Primary Instrument</u> <i>Animal Welfare Act</i> created in 1988 and amended in 2018</p> <p><u>Key Facts</u></p> <ul style="list-style-type: none"> Requires animals to be able to “perform behaviours for which they are strongly motivated for and that are important for their well-being (natural behaviour)” <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Introduction of the legislation instituted stricter requirements on the keeping of fur animals Required foxes to only be kept in such a way that they can be active, dig and socialize with other foxes New requirements rendered fox farming economically unsustainable in the country, closing all farms in 2001 Mink farms are still allowed under the legislation 	<p>Legislation: https://www.government.se/494b85/contentassets/9f6a4e0fb1704a0ba72531b63811ac22/animal-welfare-act-sfs-2018-1192-12-mars-2020.pdf</p> <p>Other Info: https://www.djurensratt.se/blogg/decline-swedish-fur-industry#:~:text=Fur%20farming%20came%20to%20Sweden,2%20million%20pelts%20a%20year.</p>
Bans promised or currently being debated		
France	<u>Key Facts</u>	https://www.loc.gov/law/foreign-

	<ul style="list-style-type: none"> Planned ban introduced in a speech September 29, 2020 by Minister of Environmental Transition Barbara Pompili No new farms will be authorized, and all existing farms must close by 2025 <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Does not impact the orytag rabbit fur industry 	news/article/france-french-government-announces-ban-on-wild-animal-performances-and-mink-farming/ https://www.reuters.com/article/us-france-animals-circus-idUSKBN26K24V
Poland	<p><u>Key Facts</u></p> <ul style="list-style-type: none"> Planned ban introduced in September 2020 Closure of all existing farms within a year of the ban passing Ban would impact 700 of the 810 fur farms in Poland Currently, no compensation for farmers referenced in the bill 	https://www.theguardian.com/environment/2020/sep/29/film-showing-cannibalism-prompts-probable-ban-on-fur-farms-in-poland
Ireland	<p><u>Key Facts</u></p> <ul style="list-style-type: none"> Phased removal of all fur farms in the country (three in operation currently) <p><u>Additional considerations</u></p> <ul style="list-style-type: none"> Prohibition of Fur Farming Bill 2018 put forward in government and got to the first stage of the legislative process, but was not passed any further due to dissolution of the government. 	https://www.thejournal.ie/future-of-fur-mink-farming-ireland-5271940-Nov2020/ https://www.politico.eu/article/ireland-signals-likely-end-to-fur-farming-with-cull-of-120000-mink/ https://www.gov.ie/en/press-release/28e8c1-government-approves-phasing-out-of-fur-farming/?referrer=http://www.agriculture.gov.ie/press/pressreleases/2019/june/title,128816,en.html

APPENDIX B (Ref: 194646)

<u>Jurisdictions which allow and regulate fur farming</u>	
The following table outlines jurisdictions where fur farming is allowed and regulated. This table does not provide an exhaustive list of countries where fur farming is allowed; instead, it highlights jurisdictions which produce the most pelts.	
Canada	Fur farms exist in all provinces, but most farms are found in the following provinces: <ul style="list-style-type: none">• Ontario• Nova Scotia• British Columbia• Newfoundland and Labrador• Prince Edward Island• Quebec
United States	Fur farms exist in 23 states, with the following states producing the most pelts annually: <ul style="list-style-type: none">• Wisconsin• Utah• Idaho• Oregon• Minnesota
International	In addition to Canada and the United States, the following countries' fur farms produce the most pelts annually: <ul style="list-style-type: none">• Denmark• Finland• Spain• Russia• China

APPENDIX C (Ref: 194646)

Fur Animal Welfare Requirements in Legislation

This table provides a comparison of the animal welfare requirements in legislation in different jurisdictions. Sweden and Germany were chosen for comparison as these countries' welfare requirements have made some or all fur farming economically unviable within the countries. The legislation governing animal welfare in the different jurisdictions are as follows:

British Columbia: The Fur Farm Regulation, *Animal Health Act*, *Prevention of Cruelty to Animals Act* (PCAA), Animal Care Codes of Practice Regulation

Canada: The National Farm Animal Care Council's Code of Practice for the Care and Handling of Farmed Mink and Code of Practice for the Care and Handling of Farmed Fox (*Vulpes vulpes*), the *Criminal Code*

Sweden: *Animal Care Act*, Animal Welfare Ordinance, Regulations and general guidelines of the Swedish Board of Agriculture on the rearing and keeping of fur animals

Germany: *German Animal Welfare Act*

General animal welfare requirements		Mink	Foxes	Chinchillas
BC	<p>Care Requirements</p> <ul style="list-style-type: none"> - Persons responsible for an animal must not cause or allow an animal to be in distress. - Animals must be protected from circumstances likely to cause distress - Animals must have access to a sufficient food supply and clean, palatable water. <p>Facility Requirements</p> <ul style="list-style-type: none"> - Must protect the animals from extreme weather. - Must be sufficiently lighted and allow for access to sufficient hours of continuous daylight. - Must allow for the observation and care of animals. <p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be of sufficient size to comfortably accommodate all animals intended to be held. - If more than one animal is in a cage there must be either another level or a nest box. - Must be safe and clean and allow for proper drainage when washed. - Must allow air to flow freely in around the cage. 	<ul style="list-style-type: none"> - Reasonable and generally accepted practices for care are described in the Code of Practice for the Care and Handling of Farmed Mink. - The Code referenced can be used as a defence against conviction under the PCAA. 	<ul style="list-style-type: none"> - Reasonable and generally accepted practices for care are described in the Code of Practice for the Care and Handling of Farmed Fox (<i>Vulpes vulpes</i>). - The Code referenced can be used as a defence against conviction under the PCAA. 	<ul style="list-style-type: none"> - No specific requirements established.¹
Canada	<p>Care Requirements</p> <ul style="list-style-type: none"> - Everyone who willfully causes, or allows, unnecessary pain, suffering or injury to an animal commits an offence under the <i>Criminal Code</i> 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Cages with multiple animals must have a hammock/shelf/platform and at least one manipulative enrichment 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Mature foxes must be housed individually, with pups housed in pairs or groups 	<ul style="list-style-type: none"> - No specific requirements established.

	<p>- Producers must ensure welfare needs (e.g. clean water, sufficient feed to maintain health and vigour, shelter and environmental enrichment) can be met on site.</p> <p>Facility Requirements</p> <ul style="list-style-type: none"> - Air flow for dry, healthy environment and prevention of excessive heat and cold is always required. - Must replicate daylight provided by a natural photoperiod. - Any light provided must be sufficient to express natural behaviours. - Artificial lighting must not negatively impact the normal circadian rhythm. - Must allow animals to observe each other. <p>Cage requirements</p> <ul style="list-style-type: none"> - Access to water is always required. <p><i>Nest boxes:</i></p> <ul style="list-style-type: none"> - Must be designed to hold adequate bedding and allow for good nesting behaviour to provide a comfortable, safe, and secluded place. - Must be able to accommodate all animals in the pen comfortably at the same time. 	<p>Minimum dimensions: 0.20-0.25m length, 0.38m height, 1.45-2.22 m² minimum floor space</p> <ul style="list-style-type: none"> - If over two animals in cage, a minimum of 0.65m² per additional animal. 	<ul style="list-style-type: none"> - All foxes must have access to at least one enrichment that can be manipulated. <p>Minimum dimensions: <i>Single foxes:</i> 0.91m length, 0.91m height, 1.1-1.4m² minimum floor space</p> <ul style="list-style-type: none"> - Pairs of animals to have a minimum of 0.84m² per animal. 	
Sweden ²	<p>Care requirements</p> <ul style="list-style-type: none"> - Animals must be kept and cared for in a good environment such that: 1. well-being is promoted; 2. animals are able to express natural behaviours; and 3. behavioural disorders are prevented. - Animals must be observed at least once per day and kept in a way that allows observation without difficulty or disturbance - Action must be taken immediately if abnormal behaviour is noticed - Animals must be provided with daylight access beyond windows - Animals must be protected from direct sunlight and not kept in constant darkness or light 	<p>Care requirements</p> <ul style="list-style-type: none"> - Adult animals may not be kept together - Claws should be inspected and cut regularly - Regular food requirements must not be reduced to bring about weight loss - Feeding must occur twice a day <p>Cage Requirements</p> <ul style="list-style-type: none"> - Requirements for climbing cages, platforms in every cage, nest boxes with bedding material and enrichment 	<p>Care requirements</p> <ul style="list-style-type: none"> - Animals must be kept in a way that satisfies their need to socialise with other foxes and to move, dig and otherwise occupy themselves.³ 	<p>Care requirements</p> <ul style="list-style-type: none"> - Animals must be kept in pairs - Freedom of movement must not be restricted by obstructing objects such as a collar - Chinchillas must be protected against sudden and loud noises <p>Cage Requirements</p> <ul style="list-style-type: none"> - Requirements for multi-level cages, enrichment objects and access to sand

	<ul style="list-style-type: none"> - Animals must be exposed to and accustomed to humans starting at a young age - Killing and pelting must take place away from live animals - Animals must be kept satisfactorily clean <p>Facility Requirements</p> <ul style="list-style-type: none"> - Must be designed to prevent disturbances from noise, pollution or other factors - Light level must be sufficient for animals to behave normally and correspond to the animals' natural circadian rhythm - Presence of pests must be minimized <p>Cage Requirements</p> <ul style="list-style-type: none"> - Provide enough space to meet the normal need for movement and appropriate enrichment - Cages lined up so animals cannot harm one another 	<p>objects that must be replaced regularly</p> <ul style="list-style-type: none"> - Cages must not be kept on top of each other <p>Minimum dimensions: 0.8m length, 0.45m height, 0.255m² bottom area</p> <ul style="list-style-type: none"> - Area should be increased by 0.085m² for each additional young animal 		<p>baths at least once per day</p> <p>Minimum dimensions: 0.5m width, 1m height, 0.5m² total area</p> <ul style="list-style-type: none"> - Area should be increased by 0.16m² for each additional young animal
Germany	<p>Facility Requirements</p> <ul style="list-style-type: none"> - Must allow for the natural behaviour of the animal, and allow them to eat, drink and rest according to their species. - Must be equipped with frost-protected watering devices and allow constant access to drinking water. - Must allow for the removal of the fur animals without pain or avoidable suffering. - Must offer protection from direct sunlight. - Lighting levels must accord with animals' natural cycles - Must allow for observation of animals. - Adult animals are not kept individually. - Animals can see others of their species. - Excrement is removed at least daily if kept inside or at least weekly if the animals are kept outside. - Fur animal must be accustomed to handling by people from birth. 	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Floor of housing must be at least partially paved. - Must have at least one platform per animal on which an adult animal can lie and stand up and under which an adult animal can stand up. - Must have devices for climbing that do not consist of wire mesh and have holding devices. - Must be equipped with tunnels. - Must include a swimming pool with of at least 1m² and 30cm deep. <p>Minimum dimensions, in addition to nest box and swimming pool: 1.7m width, 1.7m length, 1m height.</p>	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be mounted in an elevated position and have a main chamber and an antechamber which hides the entrance to the main chamber. - Must have at least 2m² for digging and draining of excretions - Must have at least one platform per animal on which an adult animal can lie and sit upright and under which an adult animal can sit upright. - Must be equipped with tunnels. <p>Minimum dimensions in addition to nest box:</p>	<p>Cage Requirements</p> <ul style="list-style-type: none"> - Must be equipped with tunnels - Must have at least one platform per animal - Must have a sand bath filled with quartz-free sand with an area of at least 250cm² <p>Minimum dimensions in addition to nest box and sand bath: 1m width, 1m length, 1m height</p> <ul style="list-style-type: none"> - Area should be increased by 0.5m² for each additional animal

	Cage Requirements - Cages must not be kept on top of each other - Animals must have access to behavior-appropriate environmental enrichment outside of the nest box <i>Nest box:</i> - Must have separate area with solid walls where all animals can rest at the same time - Opening is positioned so that newborn animals are restrained, and adult animals have easy access - Must have hay, straw or another suitable material to ensure animals can keep the nest box warm with their body heat	- Area should be increased by 1m ² for each additional animal.	3.46m width, 3.46m length, 1.5m height - Area should be increased by 3m ² for each additional animal	
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¹ Chinchillas are not mentioned in the Animal Care Codes of Practice Regulation, nor is there a Code of Practice for chinchilla care established by the National Farm Animal Care Council.

² In January 2019 the Swedish Board of Agriculture (SBA) concluded a study on whether mink in the fur industry live in conditions compliant with the *Animal Welfare Act*. The findings of the study were inconclusive, but the SBA noted positive changes in mink welfare since their regulations were established.

³ The welfare requirements on the keeping of farmed foxes has made fox fur farming economically unviable within Sweden.

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s.12 ; s.13

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s.13 ; s.16

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Withheld pursuant to/removed as

s.12 ; s.13

FW: ELUC meetings for Mink/Fur Farm and Animal Activism

From: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>, Lyttle, Shawna AFF:EX <Shawna.Lyttle@gov.bc.ca>, Rainforth, Kelly A AFF:EX <Kelly.Rainforth@gov.bc.ca>
Sent: September 15, 2021 12:21:33 PM PDT

Hey Lauren,
Can you advise?
A

From: Rainforth, Kelly A AFF:EX <Kelly.Rainforth@gov.bc.ca>
Sent: September 15, 2021 12:19 PM
To: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>; Lyttle, Shawna AFF:EX <Shawna.Lyttle@gov.bc.ca>
Subject: RE: ELUC meetings for Mink/Fur Farm and Animal Activism
Hi Arlene and Ardice,

s.12; s.13

Given the short turn around time we have been asked to provide unsigned copies of our submission on Friday and signed copies on Monday.

What is the status of the submission? How can I best help.

Kind regards, Kelly

Kelly Rainforth

Director of Corporate Planning and Intergovernmental Relations
Deputy Minister's Office | Ministry of Agriculture, Food and Fisheries
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3
kelly.rainforth@gov.bc.ca | Office phone: (250) 952-3266 | Cell: (250) 886-5028

From: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>
Sent: September 15, 2021 10:30 AM
To: Rainforth, Kelly A AFF:EX <Kelly.Rainforth@gov.bc.ca>
Cc: Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Subject: ELUC meetings for Mink/Fur Farm and Animal Activism

Hi Kelly,

In our meeting with the DM this morning, he advised that fur/mink is a go to get on the ELUC agenda. Can you arrange this?

s.12; s.13; s.14

is something that AFF needs to get time on the ELUC agenda for. Can you arrange this too?

Let me know if you need more.

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

tomorrow so this

RE: Virus Mitigation - Mink Producer Responses

From: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>
To: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Cc: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>, Crabtree, Alexis <Alexis.Crabtree@fraserhealth.ca>, Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Sent: September 17, 2021 12:08:11 PM PDT
Attachments: Mink Virus Mitigation Responses_EN.docx

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

Hello Lauren,
My comments are attached.
Regards,
Emily

From: Yawney, Lauren AFF:EX <Lauren.Yawney@gov.bc.ca>
Sent: Friday, September 17, 2021 8:57 AM
To: Newhouse, Emily [FH] <Emily.Newhouse@fraserhealth.ca>
Cc: Anderson, Arlene AFF:EX <Arlene.Anderson@gov.bc.ca>; Crabtree, Alexis <Alexis.Crabtree@fraserhealth.ca>; Todosichuk, Ardice AFF:EX <Ardice.Todosichuk@gov.bc.ca>
Subject: Virus Mitigation - Mink Producer Responses
Importance: High
EXTERNAL SENDER. If you suspect this message is malicious, please forward to spam@phsa.ca and **do not** open attachments or click on links.

Hello Dr. Newhouse,
Thank you again for participating in our meeting with the mink producers, and taking the time to provide your perspective on the points provided in their presentation. We really appreciate having your thoughts and expertise as we work on this issue.
I have created a table outlining the virus mitigation measures provided in the Risk Assessment, the industry's response, and your thoughts. I was hoping you could review the attached document quickly to confirm I have accurately captured your feedback. I have highlighted the sections I would like your opinion on for ease of reference. Please let me know if you have anything that needs to be changed, or any other insights you'd like to add.
I know Dr. Crabtree was unable to participate for the full meeting, but I have also CC'd her on this email in case she has any insights to offer as well.
Thank you again,
Lauren
Lauren Yawney, MA
Senior Legislation Analyst
Corporate Policy and Priorities Branch
Ministry of Agriculture, Food and Fisheries
(236) 478-3443

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s.13

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Withheld pursuant to/removed as

s.12 ; s.13

Mink - ELUC Oct 18th

From: Rainforth, Kelly A AFF:EX <Kelly.Rainforth@gov.bc.ca>
To: McGuire, Jennifer AFF:EX <Jennifer.Mcguire@gov.bc.ca>
Cc: Norton, Chris AFF:EX <Chris.Norton@gov.bc.ca>
Sent: September 24, 2021 1:48:50 PM PDT

Hi Jennifer,

I received a call from Cabinet Operations.^{s.12; s.13}

^{s.12; s.13} There are a number of changes required including the following:
^{s.12; s.13}

The deadline for the reworked draft is end of next week Oct. 1st. The signed final is due Oct 11th. Let me know if you want to discuss.

Kelly

Kelly Rainforth

Director of Corporate Planning and Intergovernmental Relations
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s.12 ; s.13