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Re: Fur Farming in British Columbia

Dear Member of Legislative Assembly,

Established in 1953, The Fur-Bearers is a charitable, non-partisan, non-profit organization dedicated to protecting fur-bearing animals in the wild and confinement. We have hundreds of thousands of supporters across Canada, the majority of whom live in British Columbia.

We are writing to provide information and outline concerns about the fur farming sector in British Columbia. Fur farms are industrialized facilities that hold hundreds to tens of thousands of mink, foxes and other animals in close confinement for the purpose of selling pelts. This is a commercial sector separate from trapping. As you may be aware, the SARS-CoV-2 virus has been affecting mink farms across Europe and the United States. Additionally, there have been two mink farms affected by the coronavirus in Canada, both of which are located in British Columbia's Fraser Valley. While the coronavirus pandemic has introduced new risks due to the intensive farming of fur-bearing animals, there have long been other serious and unaddressed concerns regarding fur farming in British Columbia.

In the attached report - *It's Time: Ending Fur Farming in British Columbia* - we provide a brief background and overview of fur farming in the province, including the regulatory framework that governs the sector. Our report provides information about the following issues: animal welfare, public health, and environmental concerns; public opinion surveys about British Columbians' attitudes towards fur; jurisdictions and companies that have brought forward fur bans; and a snapshot of the industry's decline, economic viability, and contribution to British Columbia's agricultural sector.

**We are providing you with this report in the hopes that you will raise the issue of fur farming in the legislature. We hope that you will advocate to phase-out the remaining fur farms in the province, support fur farmers' transition to other sustainable industries that are aligned with the province's climate goals, and introduce and support a ban on fur farming for all species in British Columbia.**

Sincerely,

A handwritten signature in black ink that reads "Erin Ryan".

Erin A'tman Ryan, BSc, BIT, MSc candidate  
President, The Fur-Bearers

December 10, 2020

To whom it may concern,

**This letter is a statement in support of a legislative ban on fur farms in BC, from an infectious diseases and public health perspective.**

I am an Infectious Diseases Specialist based at the Vancouver General Hospital and a Clinical Assistant Professor of Medicine at the University of British Columbia. I am concerned about pandemic diseases and zoonotic infections. I worked in Ontario during SARS, in Newfoundland during the 2009 H1N1 pandemic, in Guinea and Sierra Leone during the 2014 Ebola outbreak, and am now working on the COVID-19 ward at Vancouver General Hospital.

The rapid spread of SARS-CoV-2 among mink on high-density fur farms in other countries, and the rapid accumulation of novel mutations as the virus has adapted to this new animal host have raised local and international concern. Scientists and virologists studying SARS-Cov-2 have raised real concerns that outbreaks on large mink fur farms could lead to a SARS-CoV-2 reservoir in animals that could lead to future spillover events back to humans years later - similar to the current scenario with bird and swine influenza.

It is important to note that infectious diseases risks would also apply to rabbits and foxes kept on high-density fur farms. Although there have been no documented outbreaks on rabbit or fox fur farms that I am aware of, research studies have shown that these animals are also susceptible to SARS-CoV-2 infection. The fact that mink are also susceptible to both human and bird influenza and, similar to pigs, could act as a mixing vessel for future pandemics adds additional reason for concern.

These are serious concerns. These risks and attendant external societal costs should prompt a re-evaluation of the existing legislation governing fur farms in BC. In light of the risks, the industry's trajectory, and public opinion, I would support a legislative ban on fur farming in BC and the rest of Canada.

Sincerely,

Jan Hajek

Jan Hajek, MD, FRCPC, DTMH  
UBC Division of Infectious Diseases  
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# IT'S TIME

## Ending Fur Farming in British Columbia

The fur farming industry has received international attention throughout much of 2020 due to COVID-19 outbreaks among workers on mink farms, documented cases of the SARS-CoV-2 virus spreading from humans to animals and back again, mutations in the virus as it spread on mink farms, and the corresponding culls of millions of mink in numerous countries.

This issue of confining and killing wild animals for their fur is contentious. Public attitudes towards this practice have declined across Canada over the past several years. The province with the lowest public support for this practice is in British Columbia. To add to the animal welfare concerns of intensively farming wild animals and killing them for their fur, the coronavirus pandemic has prompted additional concerns around fur farming's risks to public health and the threat it poses to wild animal populations.

The province of British Columbia can position itself as a leader to become the first province in Canada to ban fur farming and join the numerous jurisdictions around the world that have ended this practice. Continuing with the status quo is problematic, the fur farming industry has reached a tipping point: the risks are high, the industry is in decline, and public support is at record lows.

British Columbia has the opportunity to finally end the confinement of wild animals for their fur and help fur farmers transition to other industries that help B.C. meet its climate goals.

**Not only is it the right time to do so,  
it is the right thing to do.**

### Background and Current Situation

British Columbia is currently home to 13 fur farms (FOI request AGR-2020-02333). The animals bred on these farms are typically born in the spring and killed in the fall with their pelts removed and sold in the domestic and international fur trade which predominantly sells to a luxury fashion market. British Columbia produces the 3rd highest number of pelts from fur farms in Canada, behind only Ontario and Nova Scotia. The most recent data released by Statistics Canada indicates that 269,400 mink were killed for their fur in BC in 2018. However, the total number of mink born into fur farms that year was 281,600, as not all mink were pelted (over ten thousand mink either escaped, died, or were sold).

The most common animals to be farmed for their fur in Canada are mink and foxes. Currently, all of BC fur farms

are farming mink, however the BC Fur Farm Regulation also permits the farming of chinchilla, fisher, fox, marten, or nutria. Most of British Columbia's fur farms are located in the Lower Mainland, with farms ranging from several hundred to tens of thousands of animals per farm (FOI request AGR-2018-84625).

## Legislative Overview

Fur farms are regulated under the *Animal Health Act*, SBC 2014 c 16, and *Fur Farm Regulations*, BC Reg. 8/2015. Industry guidelines for the care and handling of farmed mink are found in the *Code of Practice for the Care and Handling of Farmed Mink* developed by the National Farm Animal Care Council (NFACC).

The overall aim of the *Animal Health Act* is to limit the spread of current and emerging diseases among animals and respond to disease outbreaks. The *Fur Farm Regulations* specify licensing information and outline basic requirements regarding animal husbandry and operational matters. NFACC Codes of Practice are national guidelines for the care of farmed mink. The NFACC Code of Practice for the Care and Handling of Farmed Mink are referenced in the *Animal Care Codes of Practice Regulation*, BC Reg. 34/2019 under "reasonable and generally accepted practices". The *Prevention of Cruelty to Animals Act*, RSC 1996, references "reasonable and generally accepted practices of animal management" which is interpreted as those practices defined in the NFACC Codes of Practice.

## Animal Welfare Concerns

As the provincial animal welfare agency, the BC SPCA works to protect and enhance the quality of life for farm animals in BC. The BC SPCA is not opposed to farming animals if the conditions in which the animals are raised meet the Five Freedoms as defined on their website. However, in the organization's *Position Statement on Animals Used for Clothing, Fashion and Art*, the BC SPCA writes that it is opposed to the killing or use of animals for their fur.

Mink bred into fur farms have been found to suffer significant harms due to their extreme confinement in wire-bottom pens. These semi-aquatic animals have a natural territory of up to 2,500 acres and their natural behaviours include hiding, swimming, hunting, running, and socializing. In fur farms, they are unable to engage in any of these behaviours as they are housed in cages that are less than the size of two sheets of paper.



Canadian fur farm  
photo: Jo-Anne McArthur / #MakeFurHistory

Footage obtained by The Fur-Bearers has documented the conditions of fur farms across Canada and is available for viewing on our website. This footage shows animals exhibiting repetitive, stereotypic behaviours, self-mutilation, and cannibalism. Animals are regularly found to be living in unsanitary conditions where large mounds of excrement build up under the wire cages. Mink are seen living in their own feces that line their bottom and sides of their cages.

The Codes of Practice developed by NFACC outline recommendations or requirements for mink farming. However, even the basic requirements set out by NFACC are problematic as they lead to severe physical and psychological conditions. For example, for housing a single female mink, the minimum size allowance for a wire pen is 8in (width) x 15in (height), only a few inches larger than a letter size piece of paper.<sup>1</sup> Farmed mink are confined to this pen (and a small nest box) for their entire lives until they are killed. The Codes of Practice requirement for killing mink is to asphyxiate them by placing them into gas chambers filled with carbon monoxide. The Codes of Practice requirement for killing foxes is through anal electrocution. This is done by inserting a probe into a fox's rectum, a bite bar into the fox's mouth, and passing electric current through the animal's body until he or she dies.<sup>2</sup>

NFACC is currently in the process of amending the Code of Practice for the Care and Handling of Farmed Mink. Many of these proposed amendments are problematic and create loopholes for producers to renege on commitments made in 2013. For example, the 2013 Code of Practice required that all mink farms transition to specified cage requirements by December 31, 2023. The mink industry has stated that only 50% of farms have

met this requirement so far and not all producers will be able to meet the 2023 deadline. Under the amendment to the “euthanasia” section, there is currently only one approved method: gas chambers filled with CO<sup>2</sup>. NFACC is proposing to add a “back-up” method in case a compressed gas cylinder of CO<sup>2</sup> is unavailable to kill mink. One proposed back-up method is to use exhaust carbon monoxide from a “proven effective combustion source (e.g. engine).”<sup>1</sup>

In addition to the NFACC guidelines, British Columbia’s *Fur Farm Regulations* include mandatory provisions that outline basic requirements for food, water and housing, however, the provisions are general in their language so they can be interpreted broadly. Aside from the animal welfare issues pertaining to the guidelines and regulations themselves, a concern with the guidelines and the regulatory framework is the absence of mandatory inspections to actually enforce them. Neither the *Animal Health Act* nor the *Fur Farm Regulations* require mandatory, regular inspections by government officials so the lack of enforcement poses a problem for the welfare of farmed mink. Because of this, health concerns of mink may be ignored or not reported unless a member from the public submits a complaint.

In our freedom of information request AGR-2018-84625, inspection reports from Ministry of Agriculture officials documented severe animal welfare concerns on multiple farms that resulted from such complaints from the public. On one farm in which the ministry was investigating a complaint, the inspector found, among numerous other concerns:

- Moderate to strong smell of ammonia
- Build-up of feces beneath the cages and in some cages
- Mink with increased tear production and wet fur around the eyes (conjunctivitis)
- One of the mink was minimally responsive; squinting eyes
- Several mink had one or multiple digits that were noticeably swollen at the tips; affected digits were missing claws with mild to moderate facial swelling around the maxillary lip, nose, and around the lower eye lid
- One mink was curled in the middle of the cage and minimally responsive; no obvious disease (face was hidden from view), cage mates were very active



Minks in cages compliant with NFACC standard requirement  
photo: Jo-Anne McArthur / #MakeFurHistory

- Several mink had tails with excessive grooming or sores on the tail tips
- Sick and injured mink not being treated
- Over-crowding of cages: Many instances where four mink were in a cage with approximately 300sq inch of floor space and no additional shelf/platform

For this particular farm, it was noted by the government officer that: “Though we did not go through all the sheds, this list is what was observed in the ones that we did inspect and was a good representation of the farm.”

## Public Health Concerns

The recent outbreaks of the SARS-CoV-2 virus on mink farms across Europe, the USA, and now British Columbia have added another worrying dimension to the coronavirus pandemic. As a result of the transmission of COVID-19 to mink, the SARS-CoV-2 virus has mutated.<sup>3</sup> The mutations may help the virus better transmit among mink. These mink-related mutations have occurred on a key part of the viral genome, the Spike protein, which is also the target used by our immune response and by vaccines developed against the virus. This has raised serious concerns about vaccine efficacy. Of critical concern was that these mutated strains of the SARS-CoV-2 virus that evolved in mink were also found among people in communities near the farms in Denmark.<sup>4</sup> To compound this problem, it has been reported that infected mink in Denmark have escaped into the wild.<sup>5</sup> On December 13, the United States Department of Agriculture reported the world’s first wild animal tested positive for the coronavirus, where a wild mink that was in the immediate vicinity of a mink farm in Utah had tested positive for the virus.<sup>6</sup>

In a December article in the Western Producer, Dr. Vikram Misra, professor at the Western College of Veterinary Medicine in Saskatoon highlighted the risks of wild populations becoming infected with the virus and moving back to humans:

*What we’re really concerned about is it going back into a wildlife species. Then establishing itself as a reservoir in that species. It’s a concern because the virus could evolve and change. Then move back into the human population in a more dangerous form... The danger it might change and come back... is a public health concern. When a virus goes into a new host... it goes through a period of*

*fairly rapid change and adaptation. The danger is... it could acquire more virulence. We know the process occurs. It did happen in Europe and could happen anywhere else. That part of it is not hypothetical.”<sup>7</sup>*

Statistics Canada data indicates that numerous mink escape from fur farms every year (Statistics Canada categorizes ‘died or escaped’ mink into one column. In 2018, this number was suppressed due to confidentiality reasons; however, in 2017, the number was 16,000 mink. It’s unclear how many mink escaped vs. died). It is accepted knowledge within the industry that having mink escape is a common occurrence. Records obtained in our freedom of information request AGR-2018-84625 document a complaint submitted by a neighbouring property of a fur farm, explaining that escaped mink are “frolicking in our neighbour’s backyards.” A 2014 decision from the British Columbia Farm Industry Review Board, *Ormstron & Cross v Dogwood Fur Farm Ltd.*, also raises concerns from complainants of escaped mink from a nearby fur farm:

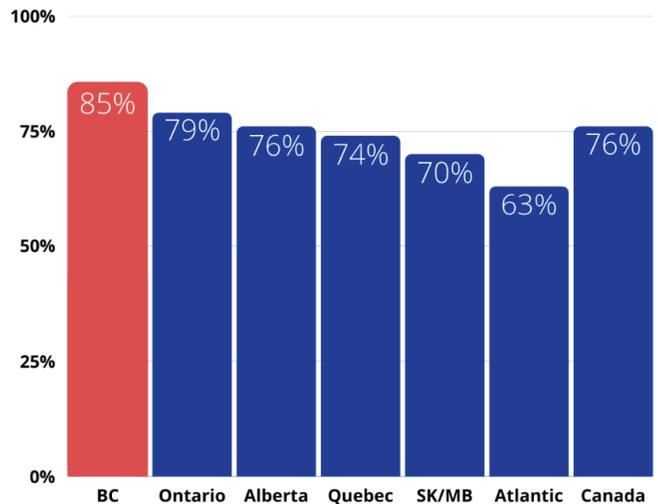
64. [Complainant] testified that he has seen escaped mink over the years (i.e. a couple per year) on his farm both at his home and in his poultry barns where they have killed chickens.

65. [Complainant] also testified the respondent farm allows vegetation to grow near the mink sheds creating a potential habitat for rodents. [Complainant] submits that according to an internet article from the US Centres for Disease Control, rodents can spread a number of serious diseases including Salmonella to other farms.<sup>8</sup>

The fur farming industry was warned in the spring that an outbreak could happen in BC and assured the public it took additional measures. Government inspected the farms in the fall and were satisfied with the biosecurity measures – yet despite all the extra precautions taken, these systems failed to prevent a virus outbreak between staff and mink on two mink farms in the Fraser Valley.

Past inaction by operators regarding animal welfare and the absence of regular inspections by government has not instilled confidence in the system that was designed to protect animals and public health. While it was reported in the Vancouver Sun on November 12, 2020<sup>9</sup> that government officials inspected all of British Columbia’s fur farms in the fall of 2020 due to concerns surrounding COVID-19, our freedom of information requests revealed

Percentage of the population opposed to killing animals for their fur



Poll conducted by Research Co. on Animals in Canada - September 22, 2020

that prior to this fall, no inspections took place since at least 2018, leaving operators to effectively self-regulate any biosecurity risks.<sup>10</sup>

As highlighted above, under both the *Animal Health Act* and the *Fur Farm Regulations*, there are no provisions requiring that mandatory, regular inspections of farms occur for either potential biosecurity concerns or animal welfare concerns. Part 4 of the Act only outlines discretionary provisions under which inspections may occur. The responsibility of reporting an animal that is affected by or has been exposed to a disease falls onto the farm operator. This is problematic as the operator may choose not to report concerns to the government, despite the requirement to do so. Although some operators may have the best of intentions, we have seen in the inspection reports noted above that operators failed to meet even the basic requirements regarding animal health set out in the

*Regulations* and the Codes of Practice. Corrective actions were recommended by government officials only as a result of complaints made by the public.

Relying on a complaints-driven, self-monitoring framework puts both animals and the public at risk, particularly so in the context of COVID-19. Despite assurances by the fur industry that biosecurity protocols are being followed, it is important to also note that biosecurity guidelines were developed by NFACC in 2013 and would likely not have anticipated or reflected the unique crisis that we currently face.<sup>11</sup>

One of the glaring omissions to NFACC’s proposed amendments to the farmed mink Code of Practice mentioned above is that there is no reference to the SARS-CoV-2 virus or any updates to the Code’s biosecurity section in response to the coronavirus pandemic. This is despite a recent guidance document published by the World Organisation for Animal Health on working with farmed animals susceptible to infection with SARS-CoV-2, which details the precautions and measures that should be implemented to prevent and mitigate the spread of SARS-CoV-2 among infected animals.<sup>20</sup>

*NOTE: A testimonial has been provided by Infectious-Diseases Specialist and Clinical Assistant Professor at the University of British Columbia, Dr. Jan Hajek. He writes, “Large high-density farms in BC pose a public health risk. Although the level of risk is not clear, there is a definite risk. This risk includes accumulating new mutations and establishing a SARS-CoV-2 reservoir in animals that could lead to future spillover events to humans – akin to the current scenario with bird and swine flu.”*

### Fur Farming Legislation

FUR FARMING BAN	FUR FARMING PHASED OUT (due to stricter regulations)	PARLIAMENTARY DEBATE	PARLIAMENTARY LEGISLATION	TRADE BAN
United Kingdom, Norway, Belgium, Netherlands, Czech Republic, Austria, Slovakia, Slovenia, Croatia, Serbia, Bosnia & Herzegovina, Montenegro, Republic of Macedonia, Sao Paolo	Germany, Japan	Poland, Lithuania, Ukraine, Estonia, Bulgaria, Montenegro, Ireland	Spain, France, Sweden, Denmark, Hungary	New Zealand, India, California, Sao Paolo

Source: Fur Free Alliance

## Public Opinion

A September 2020 poll conducted by BC public opinion firm, Research Co., found that an overwhelming majority of the Canadian population opposes the practice of killing animals for their fur. The highest opposition to this practice was in the province of British Columbia, where it was found that 85% of the population is opposed.<sup>12</sup>

In 2013, a survey by Insights West found similar attitudes towards fur. The survey found that only 15% of British Columbians supported the practice of killing animals for their fur, while 81% of the population opposed it.<sup>13</sup>

The trend is clear, opposition to killing animals for fur in BC has only been increasing over the years.

## Fur Bans: Companies, Cities, and Countries

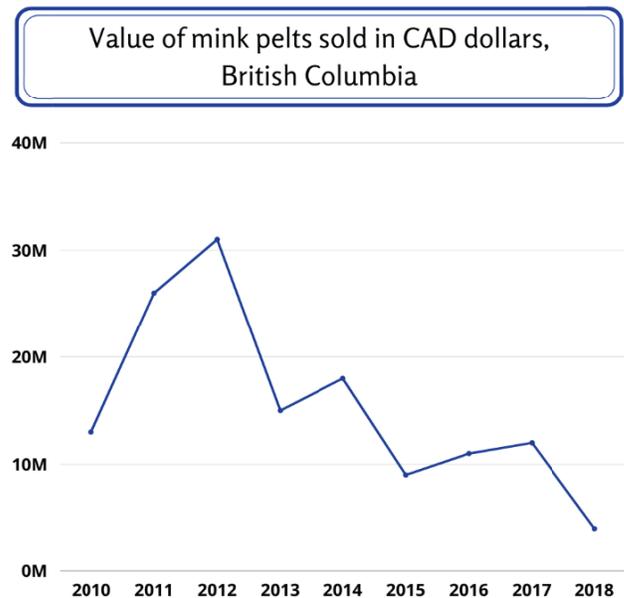
Many countries have banned the practice of fur farming and the number has increased as a result of the events of this year, most notably the Netherlands. Currently, over 20 countries have banned fur farming for some or all species or have phased fur farming out through stricter regulations. There are parliamentary discussions regarding the future of fur farming currently underway in several other countries across Europe.<sup>14</sup> Several jurisdictions have also implemented trade bans that ban the sale or importation of fur. The state of California has prohibited the sale and production of fur beginning in 2023. The state has also notably banned recreational and commercial fur trapping in September of 2019.<sup>15</sup>

There are 1492 retailers worldwide that have made commitments to go fur-free, including major companies such as Prada, Lacoste, Hugo, Gucci, Versace, and H&M.<sup>16</sup> Across Canada, 2020 saw both Winners<sup>17</sup> and Nordstrom<sup>18</sup> commit to ending the sale of fur in their stores.

## Industry Viability and Financial Considerations

BC's agricultural sector saw \$3.9 billion in sales in 2019. Farm cash receipts for raw fur in BC totalled \$4,704,000 or 0.12% of the total agricultural sales in the province in 2019. This is a 63% decrease from 2018, which saw \$12,823,000 in sales.<sup>21</sup>

A CBC analysis reported on in May 2020 suggested that since 2014, upwards of \$100 million in both federal and provincial funds have been spent to try to keep mink farming viable.<sup>19</sup> Despite the value of pelts decreasing



Statistics Canada: Table 32-10-0115-01

significantly and the industry itself is in decline (both nationally and internationally), it continues to receive public funding to stay afloat.

The Fur-Bearers does not have information regarding if or how much public funding that mink farms in British Columbia receive from the BC Government, nor do we have information on the industry's contribution to the province's GDP. However, in light of the information presented here regarding animal welfare, public health risks, environmental concerns, public attitudes, and legislative and retail bans, industry decline, it becomes clear that the risks and harms posed by this industry outweigh any economic benefits.

We are of the position that there is no viable future for fur farming, not in British Columbia, Canada, or worldwide. Countries that have banned the practice have been praised by citizens for the decisive action that governments have taken to put an end to this form of intensive agriculture.

## The Way Forward

To conclude, we are asking the Government of British Columbia to commit to ending this practice and introduce legislation to permanently ban fur farming for all species. Fur farmers should be supported in moving to business opportunities that align with the province's climate goals. This support can take the form of a multi-year phase-out program that will help farmers transition out of the fur farm industry, or by offering a one-time buyout to close their farms.

Due to the evolving and unpredictable situation in the province, if practicable, the government could

offer immediate financial support and order all farms to halt operations prior to the 2021 breeding season which typically occurs between December and March. Hundreds of thousands of mink will be bred onto BC's fur farms during the next few months and subject to the public health and animal welfare concerns outlined in this report.

**We are calling on the Government of British Columbia to implement a 2-year phase-out period for the 13 remaining fur farms in the province and introduce a permanent ban on fur farming for all species with a target date of December 2022.**



*A wild American mink peers around a boulder while hunting along the shore at Clover Point, Vancouver Island, B.C.*

*Photo by Daniel Lacy*

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