

Ministry of Health, Welfare and Sport

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Subject The situation regarding SARS-CoV-2 infections on mink farms,
the advisory opinion of the Outbreak Management Team for
Zoonoses (OMT-Z) and future policy on mink farms

Dear Chairman,

As announced in our letter of 20 July 2020, we are writing to update the House on the situation regarding SARS-CoV-2 infections on mink farms, as well as to brief the House on the conclusions and recommendations of the Outbreak Management Team for Zoonoses (OMT-Z) and the Administrative Coordination Committee on Zoonoses (BAO-Z) and to indicate how they will be reflected in our policy. Finally, we will provide a summary of the recent findings of the Animal Diseases Welfare Committee regarding the manner in which culls were handled and the findings of various studies.

1. Situation regarding infections at mink farms

To date, 42 mink farms have been found to be infected with SARS-CoV-2. The most recent outbreak occurred on 27 August in Ottersum (municipality of Genneep) at a farm with around 400 mother animals. It was detected after mink were reported to be showing symptoms of disease. All of the animals at the infected farms have been culled. Of the 42 farms, 31 are in North Brabant, 10 in Limburg and one in Gelderland. 15 outbreaks came to light because of the notification requirement, and 27 as a result of early warning testing of mink cadavers. So far, tracing has not revealed clear sources of infection at the farms, with the exception of two farms at the beginning of the outbreak, where it is thought that the virus was introduced by infected staff. The investigation into introduction pathways will continue in the coming weeks.

2. OMT-Z advisory opinion of 24 August 2020

Background

On 17 July 2020, the OMT-Z drew up an advisory opinion on the situation, of which we informed the House on 20 July 2020 (2020D30120). They advised that preventive culling be conducted on mink farms if new outbreaks occur after mid-August and the epidemiological situation in the human population remains unchanged. They also indicated that if the latter situation does change, the policy on mink farms would have to be re-evaluated. Guided by this advisory opinion, we asked the OMT-Z to provide a follow-up advisory opinion after mid-August that would take a closer look at risk assessment, as well as at appropriate and effective

measures to be taken to protect public health. This advisory opinion was drawn up on 24 August 2020, and is attached as annexe to this letter.

Source of outbreaks

On 17 July, the OMT-Z expected that over the course of the following three to four weeks, fresh outbreaks would occur at mink farms (the number was roughly estimated at 6-12). Since then, 17 new outbreaks have been confirmed. Research into how SARS-CoV-2 spreads between mink farms is still ongoing. The OMT-Z sees no evidence for transmission via feed, vehicles, pets, wild animals, farm materials or the air. They conclude that the main transmission pathway between farms is probably human-to-animal. The OMT-Z notes that it is difficult to accurately monitor contacts between farms, due to the incomplete registration of persons entering their premises, the difficulty of contacting temporary workers, and the fact that legislation to protect privacy hampers the exchange of personal data. With new outbreaks still occurring on mink farms, also after mid-August, it is clear that current measures are insufficient to prevent infection and transmission, and thus to prevent the forming of viral reservoirs.

Public health

Persons coming into contact with infected mink at mink farms run the risk of becoming infected with SARS-CoV-2. According to the OMT-Z, the risk of infection is even higher at an infected mink farm than in homes where a member of the household is infected. The OMT-Z finds, however, that the risk for people living near such farms is negligible, given the negative air samples collected outside the sheds and recent epidemiological data regarding infection rates among humans in regions with infected mink farms.

The OMT-Z concludes that the risk of mink-to-human transmission for people living in the vicinity of mink farms is currently negligible compared to human-to-human transmissibility within the population. However, the OMT-Z is concerned by the failure to halt the spread of the virus in the mink-farming sector. The continuing transmission of the virus to and from humans mainly presents a risk to workers at the farms. Although there are as yet no indications of large-scale secondary transmissions, the OMT-Z believes that individual transmissions are possible as a result of contact between mink farm staff and the general population.

Despite the fact that the risk to public health is currently considered to be low, the OMT-Z is still of the opinion that the spread of the virus between mink farms should be stopped, partly because of the great uncertainty that still exists as to the transmission route, and also because it is undesirable for the virus to continue to circulate on mink farms, where they can form reservoirs and create a risk of secondary transmission via mink farm workers to the general population in the long term.

The OMT-Z affirms its earlier opinion that, if the spread of the virus in the general population decreases over time and human-to-human transmission becomes relatively less frequent, it will become yet more important to prevent mink-to-human transmissions. Given that preventive measures to curb the spread of infection within the mink farming sector have not had the desired effect, the OMT-Z stands by its earlier opinion that mink farming should be terminated in the Netherlands.

In its previous advisory opinion of 20 July 2020, the OMT-Z suggested preventive culling as a possible approach. It concludes, however, that this is not the most effective way of stopping reservoir formation in the mink farming sector, also in view of culling capacity. The OMT-Z sees the following measures as preferable:

- culling all mink animals at infected farms;
- stepping up antibody testing at farms, in combination with better staff management (establishing a fixed relationship between workers and farms, registration of personal data and testing after exposure and in the case of symptoms);
- introducing a scheme for cessation of mink farming in the Netherlands after the fur season in November this year.

Given that the health risk for local residents and the rest of the human population is currently negligible, the OMT-Z believes this to be the best approach. Besides being the most effective strategy in the long term (by preventing reservoir forming and resultant infections), it will also be the quickest way to achieve results.

3. BAO-Z advisory opinion

The members of the Administrative Coordination Committee on Zoonoses (BAO-Z) are drawn both from representatives of the mink farming sector (the Dutch Federation of Fur Farmers and the Dutch Federation of Agricultural and Horticultural Organisations) and other stakeholders (the Royal Dutch Veterinary Association, the Practising Veterinarians Collective and the Society for the Protection of Animals), as well as from administrative partners (Safety Regions, the Association of Netherlands Municipalities, municipal health services and the Health and Youth Care Inspectorate). On 24 August 2020 they provided us with their advisory opinion, taking their lead from the advisory opinion issued by the OMT-Z.

The sector representatives endorsed the OMT-Z's advisory opinion of 24 August, but also expressed a desire for greater clarity on routes of infection and for a decision to be taken quickly but with due care on the cessation scheme for mink farmers. This would provide clarity for all concerned in the short term. The representatives of the administrative partners agreed with the OMT-Z on terminating mink farming by the end of this year (after the fur season). They expressed concern about the inadequate compliance with the registration of workers at farms, which is crucial to effective source and contact tracing. They advised that the registration of workers/visitors at mink farms be tightened up, and that workers no longer be exchanged between farms, as advised by the OMT-Z. They also recommended looking at the role of migrant workers in spreading the virus between mink farms and to other sectors in a broader context. Finally, they advised that communication be effective and that a well-considered scheme be put in place for the sector with a view to ending mink farming as of 1 January 2021. When asked, they advised that mink farming be banned even if no such scheme is set up.

4. Intended policy

We have taken note of the analyses and advisory opinions issued by the OMT-Z and the BAO-Z, and intend to give effect to them in the following way.

Bringing the ban on fur farming forward

The government sets store by preventing the spread of the virus within the mink farming sector, also because it is unknown how COVID-19 will develop among the human population and it is vital to prevent viral reservoirs forming that could increase the risk to public health next spring. The government has therefore decided to act on the OMT-Z's advisory opinion and will prepare legislation banning mink farming in the short term. The growing concern among members of the public about the infections at mink farms over the past few months has been an important factor in the government's considerations.

The government has decided against a voluntary scheme, largely because such a scheme would not guarantee that mink farms ceased to operate as of the end of this fur season, making it uncertain whether the government would be giving effect to the OMT-Z's advisory opinion. Another factor that influenced the government's decision was that new outbreaks at mink farms continue to occur, rather than levelling out as expected.

The government realises that mink farmers will be greatly affected by the proposed legislation, and that many will want to know what this means for them. In consultation with the sector, the agriculture minister will therefore make arrangements for digital meetings to be held at which mink farmers will be briefed on the situation.

The drafting of the necessary legislation will be expedited.¹ The aim is for the act – dependent of course on it being passed by both Houses of the States General – to come into force at any rate before the new breeding cycle (which normally starts in March). It would make sense for mink farmers to be allowed to complete the current production cycle, due to end around 1 December. The proposed legislation would therefore effectively shorten the current transition period provided for under the Fur Farming (Prohibition) Act (due to end on 31 December 2023) by three production cycles. This will be taken into account when drafting the proposed legislation, including the possible detrimental consequences that shortening the transition period would have for fur farmers, and what kind of compensation will be provided. A scheme providing compensation for losses will therefore be fleshed out simultaneously with the proposed legislation, taking account of the applicable legal framework. The government will earmark a maximum of €150 million for this scheme (including implementation costs).

The sum of €32 million has already been earmarked within the framework of the Fur Farming (Prohibition) Act, mainly for demolition and conversion costs. Scope will be investigated for using this sum when fleshing out the compensation scheme.

In this way, the government is also carrying out the motion by MPs Jaco Geurts (Christian Democratic Alliance) and Laura Bromet (Green Left Alliance) of 10 June 2020, requesting the government to introduce a decent cessation scheme for mink farmers and a proposal on how this would be financed (Parliamentary Papers,

¹ A pilot (which will run to the end of 2020) is currently taking place in the context of the government-wide Insight into Quality initiative whereby letters to parliament relating to new policy proposals are furnished with a separate annexe that deals point by point with the requirements of section 3.1 of the Government Accounts Act. Since the proposed legislation has yet to be fleshed out, and EU approval still has to be secured regarding the provision of any state aid, we will attach this annexe to a subsequent letter to parliament at a later stage.

House of Representatives, 2019/20, 28 286, no. 1112). The motion was adopted by parliament.

Culling policy

The OMT-Z observes that the risk for people living in the vicinity of mink farms is negligible. Nevertheless, efforts to combat infections at mink farms should be continued with vigour. This means that the current measures applying to mink farms remain in effect, and should be complied with better than has thus far been the case. We will continue to cull animals on infected farms.

The OMT-Z has not advised a preventive cull of animals on farms without SARS-CoV-2 infection, given that the risk to public health is currently considered negligible. This ties in with the policy of not unnecessarily culling healthy animals. At present, there are no alternatives to the current culling method that could speed up the process and at the same time meet animal welfare requirements (see also the paragraph, below, on the report of the Animal Diseases Welfare Committee). At present, culling capacity is just sufficient to deal with infected farms. Preventive culling of animals at farms that are not infected would be very time-consuming.

Supplementary measures

We are taking the following supplementary measures.

We are stepping up monitoring. Mink farmers will be required to hand in the carcasses of all animals that have died of natural causes to the Animal Health Inspectorate every week, rather than a maximum of five, as is currently the case.

To establish a fixed relationship between mink farms and their workers, from now on farms may only exchange workers if a waiting period of 10 days is observed between a worker leaving one farm and starting work at another. The recommendation issued by the National Institute for Public Health and the Environment (RIVM) that people self-isolate at home when a member of their household has COVID 19-like symptoms should be adhered to, so people in that situation would not be allowed to work on mink farms during that period. Staff of farms infected with SARS-CoV-2 are advised to get tested on the third and tenth days, in accordance with RIVM guidelines.

To improve compliance with and enforcement of the above measures, mink farmers are required to let the Netherlands Food and Consumer Product Safety Authority (NVWA) know in advance who is working in their sheds and when. This will enable the NVWA to carry out checks to establish compliance. It will also make it possible to check whether waiting periods are being adhered to and whether workers are getting tested as advised.

Stepping up enforcement

Currently, four to six NVWA inspectors are involved in checking compliance with the measures (task load of around 100 hours a week). They monitor compliance with the NVWA-approved hygiene protocol for the sector, the visitor registration requirement, and the mink and dung transport ban. One official report has been drawn up for a violation of the ban on transporting dung. So far, no infringements have been observed during physical road checks of vehicles. As yet we have no concrete indications of deliberate infection; the NVWA's Information and Investigation Service (IOD) will be investigating this more fully in the coming

period. At present the NVWA is looking into how it can enforce and monitor the situation more closely and effectively. It will step up checks on the registration of visitors who have compelling reasons to enter a farm, as well as on the fixed relationship between farms and workers and whether workers are complying with the testing schedule. If the NVWA finds violations of the measures, it will impose sanctions.

5. Compensating financial losses due to culling

During the debate of 10 June 2020, we gave the undertaking to provide the House with additional information about the compensation to be paid to mink farmers whose animals are culled.

The aim of compensation is to ensure in advance that mink farmers cooperate fully with animal disease control efforts. It is crucial that farmers inform the authorities as soon as they suspect an outbreak of a notifiable disease on their farm. Farmers who know that they will be compensated for culled animals are more likely to report a possible infection, which is why this essential element of animal disease control has been incorporated into the Animal Health and Welfare Act (GWWD). Farmers whose animals are culled in a bid to combat a notifiable animal disease are compensated for their loss, based on the animals' value when healthy. To comply with the rules governing state aid, the market value of animals that are to be culled must be established. This is done according to a procedure that is the same for all animals that need to be culled because of an outbreak of a notifiable disease. The act also provides that valuation needs to be done by a designated independent expert (valuer) before the animals are killed. The sum determined by the valuer is a factual finding, it does not have the status of a legal decision. The GWWD also provides that the compensation paid to the farmer should come out of the Animal Health Fund.

To assist valuers in their work and ensure uniformity in determining values, valuation tables have been drawn up for various animal species by Wageningen Economic Research (WER) (part of Wageningen University & Research) as part of its statutory tasks. These tables are updated when necessary, for instance when new outbreaks of disease occur. Annual consultation takes place between the relevant parties (government, sector and valuers) about the underlying principles and valuation system. The tables give the value of animals according to age and category, reflecting market values as closely as possible. WER assesses the value of the various species using a comparable method that draws on available market data and specific, up-to-date information provided by the sector, amongst others. WER evaluates and weighs up information provided by the sector from its vantage point as an independent body.

The tables themselves have no formal status, and are simply instruments to aid valuers in their work. No rights may be derived from them, and valuers have the freedom to deviate from them (providing they give a well-founded reason) as cases will always have to be decided on an individual basis. As promised, we enclose with this letter the valuation table for mink, used by valuers at mink farms where animals are to be culled (see annexe).

To date, compensation for the culling of animals on 42 farms totals around €38 million. The sum of €40 million has been earmarked for this purpose through the one-off, supplementary budget that will follow. This amount is separate from the sum reserved for the cessation scheme mentioned above.

6. Report by the Animal Diseases Welfare Committee on the handling of the culls
By 23 August 2020, the Animal Diseases Welfare Committee had visited 17 mink farms where the animals were culled. The House was informed of the Committee's findings on the first seven culls by letter of 20 July 2020 (D2020D30120). Between 9 July and 23 August ten mink farms where culls were taking place were visited. In its role as observer, the Committee checked to see whether any animals still showed signs of life when the gas boxes were emptied. This proved to be the case on two occasions, whereupon the animals were immediately placed in other gas boxes already filled with carbon monoxide. The Committee found that the way in which mink are handled is a point that requires constant vigilance. The NVWA was extra alert to this during the culls. The Committee found no other shortcomings or avoidable suffering during the culls.

In consultation with the Committee, other culling methods were investigated as being potentially more appropriate without negatively impacting on animal welfare. Wageningen University & Research was approached on this subject, as were other countries with a mink farming sector, such as Canada and Denmark, but no better alternatives to the current culling method were found to exist. The Committee will continue to monitor future culls and report back to the Ministry of Agriculture, Nature and Food Quality.

7. Research into SARS-CoV-2 in animals

Mink

On 31 July 2020, the final report on SARS-CoV-2 infections at mink farms was published. The aim of this study had been to gain insight into how the virus is transmitted from humans to animals, between animals, between farms and from animals to humans, as well as into the pathology in the case of mink, and the further spread of the virus in the environment. The study was carried out at the first five farms to be infected. We have already informed the House about its main findings. Measurements at the first three farms found no traces of the virus outside the sheds. At the fifth farm infected, viral RNA was found outside, but close to the shed and still on the farm premises. No living virus was found, nor was viral RNA found outside the farm premises. On two farms, cats were also found to have been infected with SARS-CoV-2. This information was conveyed in the letter to the House of 19 May 2020. In the databank of virus samples taken from people in the Netherlands who contracted COVID-19, no sequences were found that could have originated from the virus circulating among the mink at these five farms (with the exception of the two individuals who were infected by a mink). The report is enclosed (see annexe).

Cats and dogs

An initial study has just been completed as part of research into SARS-CoV-2 infection in dogs and cats. In this study animals were screened for antibodies to the virus, indicating a past infection. In total, 1,000 blood samples were tested: 500 from dogs and 500 from cats. These were samples that vets had sent to the diagnostic laboratories of Utrecht University's Faculty of Veterinary Medicine for routine diagnosis, i.e. not in connection with COVID-19 or contact with humans who had contracted COVID-19. Antibodies to SARS-CoV-2 were found in the samples of two cats (0.4%) and one dog (0.2%). The low prevalence in this tested population suggests that cats and dogs can occasionally become infected with SARS-CoV-2, probably as a result of contact with humans. Of cats tested on the

first five mink farms where outbreaks occurred, ten were found to have antibodies.

Research is still ongoing into preventing infections within other populations of dogs and cats, including cats in animal shelters and dogs and cats who are known to have had contact with an owner who has tested positive for COVID-19.

Rabbits

Serological screening at the remaining rabbit farms has now been completed. All blood samples tested negative, meaning that SARS-CoV-2 has not circulated at any Dutch rabbit farms. Nor are there any indications from other countries that rabbits could have played a role in transmission of the virus, either as farm animals or as pets.

Yours sincerely,

the minister of Health, Welfare and Sport,

the minister of Agriculture, Nature and Food Quality,

Hugo de Jonge

Carola Schouten