

# Amending the Code of Practice for the Care and Handling of Farmed Mink: What We Heard and How We Addressed It

## Introduction

The amendment to the farmed mink Code of Practice was initiated in January 2020 following a 5-year review that identified several challenges with the 2013 Code. Unlike a Code update (where the entire Code is open for revisions), a Code amendment has a limited scope of topics to be revised, and the committee must stay within this defined scope.

### Issues identified for amendment:

- Transitioning to larger pens
- Access to nest boxes
- Proper method of lifting and handling mink
- Defining body condition score extremes
- Euthanasia methods

The amendment was led by a 12-person Code Amendment Committee that included producers from across Canada, government, animal welfare researchers, veterinarians, and auditors.

This report summarizes some of the input received during the public comment period and provides insights on how it informed the final Code of Practice. It is intended to be read alongside the actual Code. Links to specific sections are provided throughout.

## Accommodations and Housing

### Section 1.2.2 Pens

**Issue identified for amendment:** Since the 2013 Code was published, progress has been made on transitioning to larger pens that offer mink more space. Canada Mink Breeders Association estimates that as of December 2020, 50% of farms comply with the Requirements in Tables 1 or 2 of the Code. However, the transition to larger pens represents a significant investment and not all mink producers will be able to comply by the December 31, 2023, deadline in the 2013 Code of Practice.

Stakeholders participating in the comment period outlined their lack of support for the proposed removal of deadlines to transition to larger pens. The Code Amendment Committee understood this concern and deliberated upon how best to balance the need to transition as quickly as possible to larger pens while ensuring a new transition deadline was achievable on all remaining farms. As such, the [Code of Practice](#) was amended to allow a maximum of five more years for all farms to comply with Table 1 or Table 2 requirements (i.e., a new deadline of December 31, 2028). The Code Amendment Committee felt that a five-year extension, along with the assurance that no further extensions will be requested, struck an appropriate balance.

The amended section also includes a new transition deadline for pens that have insufficient pen height. As of December 31, 2023, pens that meet the minimum living area in Table 3 are only permitted if the pens are at least 12 in (30 cm) high. This new requirement will trigger some farms to transition to larger pens earlier than the final 2028 deadline.

Commenters also provided valuable input on research needs applicable to this section, and these informed the final research needs list.

Going forward, Canada Mink Breeders Association commits to providing annual updates to the National Farm Animal Care Council on the industry's progress to full compliance with Section 1.2.2 requirements.

## Where We Heard From



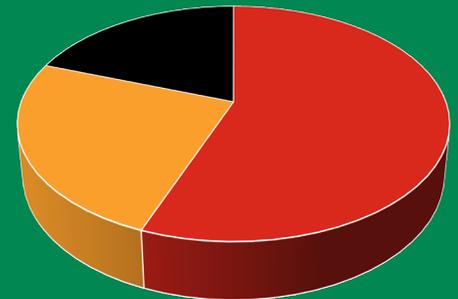
### TOP THREE GEOGRAPHIC REGIONS

British Columbia 76%

Ontario 8%

Alberta 3%

## Who We Heard From



### TOP THREE RESPONDENT GROUPS

■ Animal Welfare Advocates 80%

■ Consumers 7%

■ Researchers / Academic 1%

## Public Comment Period Submissions

The amendments to the farmed mink Code of Practice were open for a 60-day Public Comment Period.

From December 7, 2020 to February 4, 2021 approximately

1,186

submissions were received for the comment period!

**“The Code amendment process was an important opportunity to address major challenges from the 2013 Code, notably with respect to some requirements that were deemed impracticable”, said Matt Moses, Code Amendment Committee Chair and President of Canada Mink Breeders Association (CMBA). “The amendments made will enable the industry to not only incorporate achievable practices but also improve animal welfare.”**

**Matt Moses,  
Code Amendment  
Committee Chair and  
President of Canada Mink  
Breeders Association  
(CMBA)**



## Accommodations and Housing

### Section 1.2.3 Nest Boxes

**Issues identified for amendment:** Concerns were raised about the requirement to have a nest box during warm periods in the winter and nest boxes sometimes have to be temporarily removed to re-train individual mink not to soil them.

The main themes expressed in the public comment period were: changing recommended practices to requirements, maintaining clean nest boxes, providing alternative resources that permit mink to hide or seek refuge, and clarifying when nest box are needed and when removal can take place (and for how long they can be removed). The need for more research was also identified.

**In the final [requirements](#), the committee:**

- Added a note about keeping nest boxes clean to the first requirement
- Defined more precisely the maximum amount of time nest boxes can be blocked or removed
- Added a new requirement to ensure total clarity that nest boxes must never be blocked or removed during whelping or lactation
- Added a requirement that the decision to block or remove nest boxes must consider welfare risks and benefits and the basis of the decision must be included in on-farm protocols. It is hoped that this requirement will help producers evaluate the necessity for nest box removal and consider alternate strategies.

In addition, four [recommended practices](#) were added to encourage continuous provision of nest boxes and other best practices consistent with feedback from the comment period.

Overall, it was also felt that the scope of *Section 1.2.3 – Nest Boxes* was unclear relative to the scope of *Section 1.2.4 – Bedding*. The preambles of each section were edited to clarify scope and the second requirement in the bedding section was modestly edited to ensure it was focused on bedding.

## Feed and Water

### Section 3.1 Nutrition

**Issue identified for amendment:** Define more clearly what is meant by over- and under-conditioned mink so that those mink are more closely monitored and fed accordingly.

Commenters were especially concerned with the part of the draft proposing that action be taken when mink are at a body condition score of 1 out of 5—they felt this was too thin and that action needs to be taken sooner. The final amended requirement stipulates that action must be taken for mink under a body condition score of 2 so that action is taken just as they are becoming too thin to ensure mink do not reach a score of 1.

Commenters also noted that “regularly” in the second requirement was vague; therefore, the committee changed it to “daily” to clearly define how often body condition score must be monitored.

Also in accordance with feedback from the comment period, [Appendix A – Body Condition Scoring for Mink](#) now includes photographs in addition to the descriptions for the 5-point scale.

As a result of its discussions on body condition scoring and nest box removal (both of which impact on breeding animals during the conditioning phase) the committee revised the requirement in [Section 3.1.1 Breeding Mink](#) in the 2013 Code because it merely required feeding programs that condition mink “appropriately” while avoiding the need for significant dietary adjustment. However, during the public consultation, commenters took issue with the proposed wording that feeding programs “must aim to condition mink gradually” so the requirement was further amended to be more definitive as to the required expectation (i.e., the feeding program must be adjusted gradually and as early as possible to avoid significant and/or abrupt changes). The Committee also refined the requirement to reflect that it is dependent on whether there is a need to condition breeders.

## Husbandry

### Section 5.1 Animal Handling

**Issue identified for amendment:** The 2013 Code includes requirements for the proper method of carrying a mink; however, there is no reference to the proper method of catching a mink and lifting it from its pen.

Commenters expressed concerns about lifting mink by the base of the tail; however, producers consistently find that mink are less reactive and vocalize less when lifted in this way, compared to other methods. The committee did refine the new requirements based on comments that the draft wording and ordering of requirements were confusing. The new recommended practices were generally supported and were kept.

### Euthanasia and Harvest

Based on input on the need for greater clarity, the entire chapter was amended to reflect that it sets out requirements and recommended practices that apply when euthanizing individual mink for humane reasons and when harvesting groups of mink for the purpose of pelting. Criteria for when mink need to be euthanized for health and welfare reasons are still outlined in [Section 4.4 – Sick or Injured Animals](#).

### Section 6.1 Protocols and Training

The committee agreed with comments stressing the importance of protocols and proper training. They therefore created a new section on these topics to give them more prominence. Requirements for protocols and training in the 2013 farmed mink Code were moved into this section. The second requirement now also explicitly mentions training and competence in the method used, including confirmation of death.

### Section 6.2 Methods

**Issue raised for amendment:** Carbon monoxide (CO) from a compressed gas cylinder is the only acceptable method in the 2013 Code. Acceptable contingency methods were needed in the event that a compressed gas cylinder is temporarily unavailable.

After the comment period, the Code Amendment Committee did another careful review of the research and veterinary guidelines on acceptable methods of humanely killing mink. While public comments suggested that there may be other alternate euthanasia and harvest methods that could be used, the Code Amendment Committee was unable to identify viable on-farm alternatives through a further research review.

Based on the comments and another review of literature, this section was reorganized so that conditions of acceptability for euthanasia and harvest methods are very clearly outlined especially with respect to the factors that are required to ensure a rapid, irreversible loss of consciousness, a fundamental criterion for the methods as supported by all stakeholders.

Commenters stressed the need for monitoring, training, and the development of protocols, and these elements in the existing draft were retained or strengthened. Given comments expressing a desire for oversight of the contingency methods, a new requirement was added stipulating that the reason for using a contingency method must be documented (allowing for verification that either bottled CO was unavailable or its use was prohibited by health and safety regulations/rules).

The section recognizes that carbon dioxide (CO<sub>2</sub>) is aversive to mink; however, it was permitted as a contingency method based on research reporting that a chamber concentration of at least 80% is effective and, at this concentration, mink lose posture and cease all movement and respiration sooner than with CO from a compressed gas cylinder or filtered exhaust CO. In keeping with research and veterinary guidelines on the use of CO<sub>2</sub>, the amended Code also stipulates use of gradual fill chambers if CO<sub>2</sub> is ever used as a contingency method so that mink lose consciousness before they are exposed to the higher, and more aversive, concentration necessary to ensure death.

“ I was proud to work with the Code Amendment Committee, made up of a diverse group of knowledgeable individuals. ”

**Dr. Dave MacHattie,**  
representing the veterinary profession on behalf of the Canadian Veterinary Medical Association.



Picture Copyright Jesper Clausen and Bente Krogh Hansen. Used with permission.

“ The completed Code amendment reflects the hard work and dedication from everyone involved, including the feedback through the public comment period. ”

**Rob Bollert,** Code Amendment Committee member and Vice President of CMBA.

**“A common thread throughout all aspects of the Code Development Process, including the Public Comment Period, is the principle of continual improvement. Canada has set a unique path that is based on pursuing this goal through the multi-stakeholder, consensus-based approach that is led and coordinated through NFACC.”**

## Euthanasia and Harvest

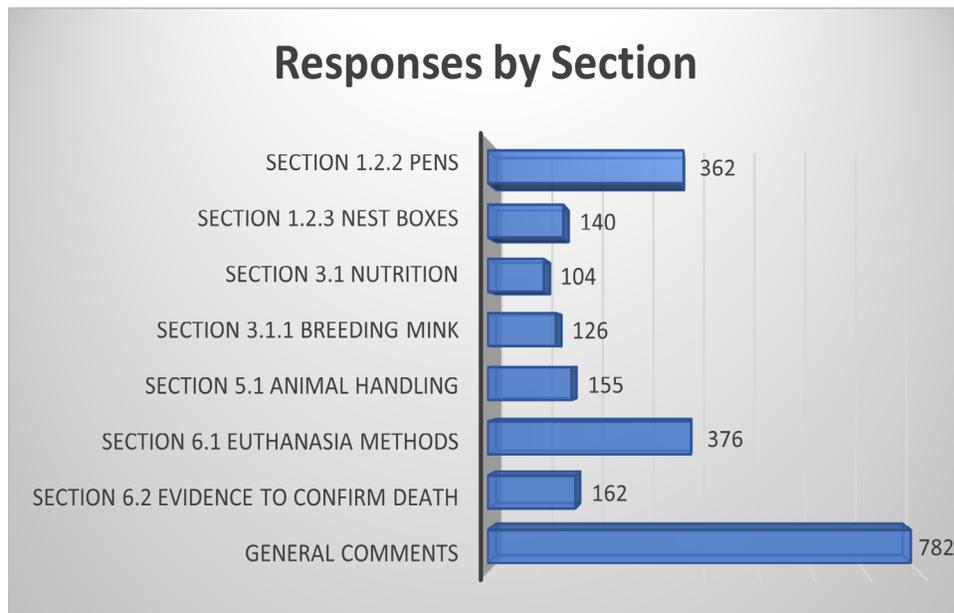
### Section 6.3 Confirming Death

**Issue raised for amendment:** The 2013 Code inadvertently communicated that death must be confirmed using five different indicators. Confirming death using all five indicators is not practical, nor was that the intention during the Code’s development.

Similar to other Codes of Practice, all five indicators are now listed in the preamble (offering key context for the requirements that follow) and the requirements were refined to stipulate that

- mink must remain in the chamber until all movement has stopped (a practical, reliable indicator)
- all producers must also have a written protocol outlining the indicators used and how they are assessed

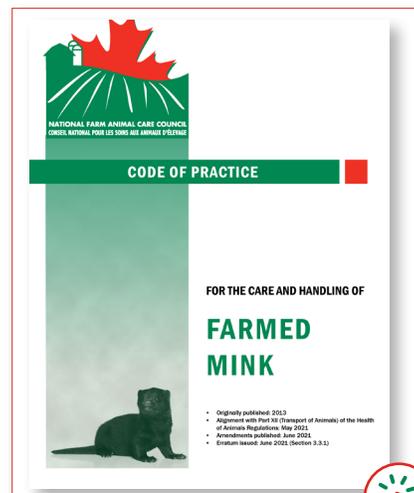
### Public Comment Period Responses by Section



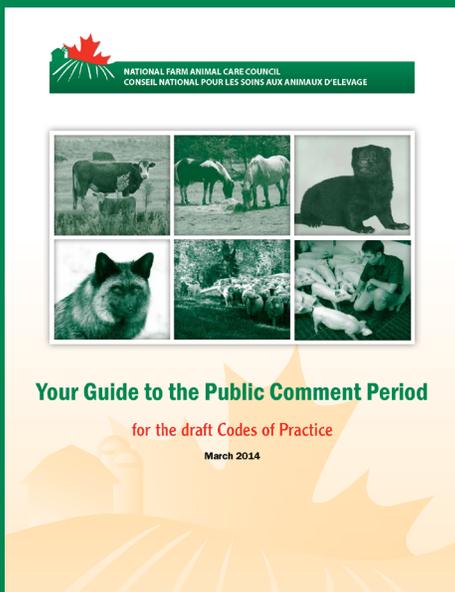
Note: count includes group and individual submissions.

## Thank You for Taking Part in the Public Comment Period!

Thank you to all those who took the time to provide input during the public comment period. Not only did your feedback inform the decisions of the Code Amendment Committee but it also served to inform research needs. While not all concerns could be addressed, the Code Amendment Committee worked hard to balance producer achievability, the available research, and stakeholder viewpoints in the amendment exercise.



**CLICK HERE TO VIEW THE CODE**



## Your Guide to the Public Comment Period

Funding for this project has been provided by Agriculture and Agri-Food Canada through the AgriAssurance Program under the Canadian Agricultural Partnership, a federal-provincial and territorial initiative.