



July 1, 2021

Zack Strong
Senior Staff Attorney
Animal Welfare Institute

Dear Mr. Strong:

Thank you for your recent letter concerning the renewal of the annual mink survey. The primary functions of the National Agricultural Statistics Services (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. NASS is the primary data collection agency of the US Department of Agriculture. NASS is one of only thirteen Federal agencies whose primary mission is statistical in nature. Our data is protected under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). The data we collect from farm and ranch operators is kept confidential and is only released to the public as summarized data. Rest assured that NASS will not disclose any Personally Identifiable Information (PII) data.

NASS is a statistical agency, not a regulatory agency, and therefore, data collected by NASS are used for statistical purposes only. Under the Paperwork Reduction Act (PRA), all Federal agencies are required to minimize respondent burden on the public by limiting the amount of data collected and the frequency of the data collections.

The content of the annual mink survey has been developed over the years based on wants and needs of producers and data users. Below are responses to each of your requests.

Request 1: To the extent not already collected, the full contact information for all of the mink farm's owners and operators.

Reply: NASS currently collects full contact information for all the mink farm operations. However, as described above, NASS does not share PII information.

Request 2: The address of each place of business at which the mink farm conducted business.

Reply: NASS currently collects the address of each mink operation. However, as described above, NASS does not share PII information.

Request 3: The legal descriptions of any lands upon which the mink farm conducted business.

Reply: This request denied. The scope of the survey as approved from OMB does not account for this information.

Request 4: All trade names under which the mink farm conducted business.

Reply: This recommendation is denied. NASS does not share any PII information.



Request 5: The number of individuals who worked on the farm.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 6: The number and sex of individual mink raised.

Reply: NASS currently collects the number of female minks. However, the scope of the survey as approved from OMB does not account for the number of male mink raised information.

Request 7: The source of each individual mink and a detailed description of how the animals were transported, and the route taken, if applicable.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 8: The number of individual mink purchased, transferred, or sold and the name of each person or entity to whom or from whom such animals were purchased, transferred, or sold.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 9: A description of the size, number, and type of the mink farm's pens, cages, or other such enclosures.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 10: A description of the barrier(s) that were used to contain the mink on the farm and prevent other animals from gaining access to the farm.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 11: A description of the procedures the mink farm used to dispose of manure, and carcasses and any parts thereof, to ensure the health and safety of farm workers, the public, and the captive and wild animals.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 12: The number of mink that died or were killed, the cause of death, and, if killed by humans, the reason each was killed and the method used.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Recommendation 13: A description of the measures the mink farm adhered to in compliance with the current American Veterinary Medical Association guidelines relevant to fur farm operations, including euthanasia and depopulation.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.



Request 14: A description of the measures the mink farm adhered to in compliance with the latest guidelines and recommendations developed by the USDA, the CDC, and any other federal agencies, in order to prevent the transmission of COVID-19 or other diseases to mink or other captive furbearing animals or to wildlife, fur farm workers, and the public.

Reply: This recommendation is denied. The scope of the survey as approved from OMB does not account for this information.

Request 15: NASS Must collect data about all fur farms:

- a) fox, rabbit, mink, chinchilla, marten, fisher, muskrat, karakul and all other fur-bearing animals, raised in captivity for breeding or other useful purposes shall be deemed domestic animals;
- (b) such animals and the products thereof shall be deemed agricultural products; and
- (c) the breeding, raising, producing, or marketing of such animals or their products by the producer shall be deemed an agricultural pursuit.

Reply: This request was denied as due to the PRA and industry recommended to collect only mink fur information to reduce respondent burden. Scope and resources will not allow this request to be granted.

Request 16: NASS must disseminate data about all fur farms to the public.

Reply: NASS currently publishes data collected from the survey at an aggregate level, following CIPSEA policy.

The annual mink survey is extremely important to our data users. Your comments will be provided as part of the submission to the Office of Management and Budget.

Please let us know if you have any questions or concerns.

Again, many thanks!

Digitally signed by Travis Averill
Date: 2021.07.01 09:40:44 -05'00'

Travis Averill
Chief, Livestock Branch
U. S. Department of Agriculture
National Agricultural Statistics Service