

Skrifstofa Alþingis - nefndasvið  
Austurstræti 8-10  
150 Reykjavík  
[nefndasvid@althingi.is](mailto:nefndasvid@althingi.is)

## Umsögn um frumvarp til laga um velferð dýra (bann við blóðmerahaldi), 12. mál.

Written by Sabrina Gurtner, Project Manager at Animal Welfare Foundation and Tierschutzbund Zürich  
Freiburg, 23.11.2023

Ég mæli eindregið með samþykki þessa frumvarps um bann við blóðmerahald í heild sinni.

In the past, Animal Welfare Foundation (AWF) and Tierschutzbund Zürich (TSB) have repeatedly put forward animal welfare and legal reasons why PMSG production should be banned. Our position has not changed.

We firmly believe that PMSG extraction from pregnant mares cannot be improved to such extent that an acceptable level of animal welfare could be guaranteed, due to systematic problems. These include in particular:

- 1. The mares are pregnant.** There is no demand for thousands of foals every year, neither for riding nor for meat production. They are just a by-product of PMSG production and many end up in pet food.
- 2. PMSG is only present in the blood of mares in early pregnancy.** Consequently, as much blood as possible is taken from the mares in a short period of time, much more than international guidelines recommend for non-pregnant horses.
- 3. It is impossible to repeatedly collect blood from horses without causing stress, fear and pain.** This situation is aggravated by the fact that the majority of blood mares in Iceland are semi-wild and not used to human handling. This increases their stress and fear.
- 4. It is impossible to guarantee the veterinary care of thousands of mares and foals within the existing production costs.** Checking the health of all horses daily and treating sick or injured mares and foals would make the production much more expensive.

Repeated high-volume blood collection is always a stressful and painful procedure for the mares. It is simply not possible to repeatedly take blood from horses without using coercive measures, without causing stress and fear, and without causing pain by the insertion of a large-bore cannula. The procedure leads to the horses being traumatised. They are flight animals that are restrained and unable to follow their instincts. At the moment of fixation, the horses have no idea that it will soon be over. Considering the defensive reactions shown, one can assume that this moment is perceived by the horses as severely stressful. The brutal handling on some farms aggravates their fear and panic.

In addition, the high volume and frequency of blood collections involve serious health risks for the mares. From late summer to autumn, 5 litres of blood are drawn from each mare once a week, up to 8 weeks in a row. This is much more than any existing guidelines or recommendations would allow. Blood collections for the manufacture of drugs are classified as animal experiments. Some guidelines for animal testing recommend

that no more than 10 % of a horse's total blood volume should be extracted every 3 to 4 weeks<sup>1</sup>, others recommend a maximum of 7.5 % once a week or 15 % every 4 weeks<sup>2</sup>. It is further not recommended to remove more than 15 % of the blood volume due to risk of hypovolemic shock. Icelandic horses are smaller than other breeds and have an average body weight of 380 kg. Horses have a total blood volume of 75 ml per kilogram body weight, which makes about 28.5 litres for an Icelandic horse. Thus, according to different recommendations for animal testing, no more than 2.14 litres (7.5 %) should be extracted once per week or 2.85 litres (10 %) every 3 to 4 weeks, or a maximum volume of 4.28 litres (15 %) once per month. However, it is important to note that these recommendations apply to non-pregnant horses.

German guidelines for the collection of blood in the veterinary field prohibit taking blood from pregnant or lactating mares<sup>3</sup>. In Iceland, the mares are both pregnant and lactating, which must be taken into account. They have to provide energy for the production of milk and also for the development of the foetus. In addition, they have to provide energy for the regeneration of lost blood components, which means a triple burden for the mares.

In March 2022, we filed a complaint with the EFTA Surveillance Authority (ESA) regarding blood farms in Iceland, as they are in breach of rules applying in the European Economic Area (EEA). The complaint was supported by Eurogroup for Animals and 14 other animal protection organisations<sup>4</sup>. We argued that Iceland did not properly apply its legislation on the protection of animals used for scientific purposes, Regulation no. 460/2017, which is derived from the EU Directive 2010/63. Both legal texts are based on the principle of the 3 Rs<sup>5</sup>, according to which animal experiments must, whenever possible, be replaced by alternative methods not relying on live animals. In the case of PMSG, such alternatives exist.

Following our complaint, the EFTA Surveillance Authority (ESA) sent a letter of formal notice to Iceland in May 2023, requesting the country to correctly apply EEA rules on the protection of animals used for scientific purposes<sup>6</sup>. ESA also stated that by adopting a new national regulation in August 2022, Iceland had created further legal uncertainty concerning blood collection from pregnant mares and failed to ensure the effectiveness of the EU Directive 2010/63. A letter of formal notice is the first step in an infringement procedure against an EEA / EFTA State.

The Icelandic government replied to ESA on 15<sup>th</sup> September 2023. In its response, the Icelandic government acknowledged that the procedure of collecting blood from pregnant mares for the production of PMSG should fall under the EU Directive 2010/63 and the corresponding national legislation, Regulation no. 460/2017. Iceland also announced that the Regulation No. 900/2022 from August 2022 will be revoked by 1<sup>st</sup> November 2023<sup>7</sup>.

Therefore, on 1<sup>st</sup> November 2023 the legal basis for PMSG production in Iceland changed. From now on, Regulation no. 460/2017 on the protection of animals used for scientific purposes will apply. This new legal situation means that Isteka and the blood farmers will have to apply for an authorisation on the basis of

<sup>1</sup> [www.nc3rs.org.uk/blood-sampling-general-principles](http://www.nc3rs.org.uk/blood-sampling-general-principles)

<sup>2</sup> [www.mdpi.com/2076-2615/11/5/1466](http://www.mdpi.com/2076-2615/11/5/1466)

<sup>3</sup> [www.bmel.de/DE/themen/tiere/tierarzneimittel/leitlinien-blut.html](http://www.bmel.de/DE/themen/tiere/tierarzneimittel/leitlinien-blut.html)

<sup>4</sup> <https://www.eurogroupforanimals.org/news/blood-farms-iceland-official-efta-complaint-filed>

<sup>5</sup> 3 Rs = replacement, reduction, refinement

<sup>6</sup> <https://www.eftasurv.int/newsroom/updates/iceland-breach-eea-rules-protection-animals-used-scientific-purposes-regards-blood>

<sup>7</sup> <https://www.eftasurv.int/cms/sites/default/files/documents/gopro/ESA.pdf>

Regulation no. 460/2017. The competent authority MAST will have to carry out a thorough project evaluation in line with this regulation before authorising the project. An assessment will have to be carried out of whether a scientifically satisfactory method, not involving the use of live animals, can be used instead, according to the principle of the 3 Rs. The project evaluation will also have to include a harm-benefit analysis of the project, to assess whether the harm to the animals in terms of suffering, pain and distress is justified by the expected outcome, taking into account ethical considerations, and may ultimately benefit human beings, animals or the environment.

It seems clear that such a project evaluation cannot have a positive outcome and that the authorisation must not be granted. PMSG is not indispensable since there are alternative methods available to breeders, including synthetic medicinal products that fulfil the same purpose as PMSG. However, it is important to note that many breeders do not use any hormones to synchronise reproduction cycles. Hormone-free methods, so-called zootechnical measures, are successfully used not only on organic but also on conventional farms. They include rehousing, exercise, outdoor climate, optimal nutrition, contact with females in oestrus and male contact.

In addition to raising serious welfare concerns with regard to horses, the use of PMSG also has a negative impact on the welfare and health of farmed animals. Indeed, one animal species is used to exploit another. The mares' hormone is used to boost productivity and efficiency in industrial farming. It promotes unnatural rates of reproduction in farmed animals and gives them no time to recover in between pregnancies, which can lead to severe health issues and early slaughter as a consequence. PMSG also induces superovulation, which may result in larger litter sizes in pigs. There are often more piglets than a sow has teats. The greater the number of piglets, the higher the risk of animals being born weak and malnourished. Increased litter size is clearly associated with increased piglet mortality<sup>8</sup>.

The "invention" of PMSG is about 50 years old. At that time, pig breeders wanted larger litters. Over the last decades, there has been a breeding trend towards large litters so that today, modern high-performance breeds give birth to too many piglets, which causes serious animal welfare problems. The number of piglets per sow has become too high, the mother can often not feed them all. Nowadays, superovulation caused by PMSG is more of an unwanted side effect. The aim of many breeders is to achieve the desired weaning rate with fewer, healthier piglets.

According to veterinary and breeding experts, PMSG can be used to cover up management problems or health issues of animals. The hormone can compensate for errors in management, animal observation, housing and feeding. With PMSG, problematic pig farms can still operate efficiently.

Professor Axel Wehrend, who carried out a study about PMSG alternatives on behalf of the German agriculture ministry from 2019 to 2021, concludes in his final report that "modern piglet production is possible without using PMSG/eCG"<sup>9</sup>. He also states that by disusing PMSG, a significant improvement in animal welfare can be achieved for both the sows (avoidance of injections, improvement of body condition and housing environment) and the pregnant mares (no repeated blood collections during pregnancy).

<sup>8</sup>[www.researchgate.net/publication/236961159](https://www.researchgate.net/publication/236961159) The welfare implications of large litter size in the domestic pig I Biological factors

<sup>9</sup> [www.mud-tierschutz.de/mud-tierschutz/wissen-dialog-praxis/schweine/brunstsynchronisation-ohne-pmsgcecg](https://www.mud-tierschutz.de/mud-tierschutz/wissen-dialog-praxis/schweine/brunstsynchronisation-ohne-pmsgcecg)

The German veterinary association BTK recommends that veterinarians avoid the use of PMSG in piglet production. Their official statement says that the use of PMSG is not essential, as alternative zoo- and/or biotechnological methods are available<sup>10</sup>. In Switzerland, the farmers' association representing almost 50,000 farmers has made the decision to prohibit the use of PMSG for all animal species<sup>11</sup>. This voluntary ban on the use of PMSG by the industry proves that animal breeding without PMSG is indeed possible.

On 20<sup>th</sup> October 2021, the European Parliament adopted by a large majority a Resolution on a *Farm to Fork Strategy* for a fair, healthy and environmentally-friendly food system<sup>12</sup>. It includes a paragraph on PMSG:

*The European Parliament,*

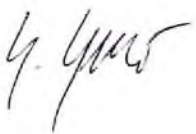
130. Recalls that **structural animal experiments that are not indispensable** should have no place in the food chain as Directive 2010/63/EU prescribes the replacement and reduction of the use of animals in procedures; **calls on the Commission and Member States to stop the import and domestic production of Pregnant Mare Serum Gonadotropin (PMSG)**, which is extracted from the blood of pregnant horses that are systematically impregnated and exposed to blood collections, involving health and welfare issues;

This call represents the official position of the European Parliament, even if it is not legally binding on the European Commission. Industrial farming systems which rely on the use of PMSG go against the objectives of the *European Green Deal* and the *Farm to Fork Strategy*, which aim to move towards more sustainable food systems, reduce greenhouse gas emissions and improve animal welfare.

**From November 2023, Isteka and the blood farmers will have to apply for blood collection as an animal experiment. However, animals may only be used for scientific purposes and for the production of medicines if there are no alternatives available. PMSG production does not meet this requirement because there are alternatives to PMSG by using hormone-free methods or synthetic products. Any authorisation would therefore be illegal. This is Iceland's chance to put an end to the blood business.**

Þar af leiðandi fer ég á leit við stjórnvöld að þau banni samstundis blóðtöku fylfullra hryssa, svokallaðra blóðmera, á Íslandi.

Virðingafyllst,



Sabrina Gurtner  
Project Manager

Animal Welfare Foundation  
Tierschutzbund Zürich

<sup>10</sup> <https://www.bundestieraerztekammer.de/tieraerzte/stellungnahmen/>

<sup>11</sup> [www.sbv-usp.ch/de/problematisches-medikament-aus-schweizer-tierhaltung-verbannt/](http://www.sbv-usp.ch/de/problematisches-medikament-aus-schweizer-tierhaltung-verbannt/)

<sup>12</sup> EP resolution: [www.europarl.europa.eu/doceo/document/TA-9-2021-0425\\_EN.html](http://www.europarl.europa.eu/doceo/document/TA-9-2021-0425_EN.html)