Skrifstofa Alþingis - nefndasvið
Austurstræti 8-10
150 Reykjavík
nefndasvid@althingi.is

Umsögn um frumvarp til laga um breytingu á lögum um dýravelferð, nr. 55/2013 (bann við blóðmerahaldi) 15. mál, 152. löggjafarþing 2021–2022

Written by Sabrina Gurtner, Project Manager at Animal Welfare Foundation and Tierschutzbund Zürich
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Undirrituð mælir eindregið með samþykki þessa frumvarps í heild sinni.

The German NGO Animal Welfare Foundation (AWF) and the Swiss Tierschutzbund Zürich (TSB) have been investigating the production conditions of the fertility hormone PMSG since 2015. After repeated public scandals about blood farms in Argentina and Uruguay, several pharmaceutical companies stopped the import of PMSG from South America in 2017/18. Since then, they have been sourcing PMSG from Europe. The main European producer of the hormone is Iceland, where most of the mares used for blood collection are semi-wild. After a two-year investigation in Iceland (2019/21), AWF and TSB published in November the documentary "Iceland - Land of the 5,000 Blood Mares", which led to the current public debate about PMSG production in Iceland.

The main reasons why AWF and TSB urge the Icelandic Government to ban blood collection from pregnant mares for PMSG production are the following:

1) Approval of unnecessary "animal experiments" is unlawful

The production of PMSG (also called eCG) is approved by MAST as animal experimentation, based on regulation no. 460/2017 on the protection of animals used for scientific purposes, which implements the EU Directive no. 2010/63 with EEA relevance. Procedures for the manufacture of drugs - such as blood collections - are classified as animal experiments. However, the EU and Icelandic legislation on animal testing is based on the principle of the 3 Rs: replacement, reduction and refinement. According to this principle, animals may only be used in animal experiments if there are no alternative methods available, and there is a strict hierarchy of the requirement to use alternative methods. Since there are numerous synthetic drugs available that fulfil the same purpose as PMSG, and since good fertility in farmed animals can also be achieved without using hormones, the indispensability requirement for animal experiments is not fulfilled. The commercially conducted blood collections from pregnant mares are unnecessary and should not be approved by the authorities.

2) Systematic breaches of Icelandic animal welfare legislation

In addition to the non-compliance with the principle of the 3 Rs, the blood collection for PMSG production violates applicable welfare requirements. The goal of the animal welfare law no. 55/2013 is that animals are free from discomfort, fear, suffering, pain and injury, inter alia, in the light that animals are sentient beings. Ill-treatment of animals is prohibited. However, it is not possible to take blood from semi-wild horses without using force or causing stress and fear. This is a systematic

problem and leads to repeated traumatisation of the mares, as stated by veterinary experts. Furthermore, the coercive restraint in the blood extraction boxes poses many risks of injuries. It is unrealistic and not economically viable to tame and train 5,300 mares so that their blood could be extracted safely, without creating unnecessary stress and fear.

The scenes of animal abuse shown in our documentary film are not individual cases or exceptions. The film shows three blood farms in operation, two of them in detail. We visited a fourth blood farm together with Isteka's manager but were not allowed to film or take pictures. We detected systematic animal welfare violations at all four blood farms, thus at 100 % of the farms we saw in operation. Severe animal cruelty, such as beatings, could only be filmed when the people concerned felt unobserved.

According to the horse welfare regulation no. 910/2014, performing procedures on horses for no medical reason is prohibited, which is clearly the case here. Even the use of PMSG in farmed animals does not serve medical purposes but purely economic ones.

3) Extracted blood volume and frequency exceed international recommendations

From late summer to autumn, 5 litres of blood are drawn from each mare once a week, up to 8 or even 10 times per season. This frequency exceeds any existing guidelines and recommendations for blood collection. Some guidelines recommend that no more than 10 % of a horse's total blood volume should be extracted every 3 to 4 weeks, others recommend a maximum of 15 % every 4 weeks. 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, no more than 2.85 litres (10 %) should be extracted every 3 to 4 weeks, or a maximum volume of 4.275 litres (15 %) once per month. In Iceland, between 15 and 20 % of the mares' total blood volume is removed once a week. The implementation of the recommended standards would drastically reduce the production volume by approx. 75 %. Such a significant reduction would go against the interests of Isteka, especially since the company is planning to more than triple the production in the coming years.

According to German guidelines for the collection of blood in the veterinary field, a maximum of 15 ml blood per kilogram body weight may be extracted every 30 days, which in the case of Icelandic horses would make 5.7 litres once per month. However, these guidelines additionally prohibit taking blood from pregnant or lactating mares. In Iceland, the mares are both pregnant and lactating, which must be also taken into account. According to Prof. Stephanie Krämer from the Justus Liebig University Giessen, the expert shown in the documentary, the mares 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.

4) Blood business is not controllable

The video recordings from 2019 and 2021 show that the supervision by MAST and by the pharma company Isteka has failed, since there are systemic deficiencies at all blood farms we documented, for example in the infrastructure (inadequate restraint boxes and raceways posing a high risk of injuries). With 119 blood farms and over 5,300 mares, it appears to us that it is unrealistic for MAST to effectively monitor this number and even a growing number of farms.

On 19 December, Isteka presented an improvement plan, which includes camera surveillance. However, a supervision by video monitoring is also unrealistic since thousands of hours of recorded blood collection would have to be analysed. Due to the large number of blood farms, the character of the horses (semi-wild) and the number of horses involved, an effective supervision of the process is not possible.

5) PMSG used to exploit animals in industrial farming

The fertility hormone PMSG is predominantly used in industrial animal breeding, where it is used to increase the reproductive performance of farmed animals - in particular sows, but also cattle, sheep, and goats - through synchronising cycles and increasing the number of offspring produced per year. There is no medical indication for the frequent application of PMSG in farmed animals. The practice only serves economic interests by stimulating and accelerating physiological processes in animals, which is not a viable reason for the use of drugs. Furthermore, PMSG is used to treat fertility problems which are caused by the system, namely by poor husbandry conditions in intensive farming. Hence, PMSG is one of the driving forces behind industrial farming.

The marketing brochure for the product Fertipig, which is produced by the pharma company Ceva Santé Animale, defines the goals of PMSG use as follows: higher insemination rate, higher number of piglets, less non-productive days, better concentration of work and increased economic efficiency.

Official figures from Germany confirm that the hormone is used systematically in piglet production. In 2019, there were 1.8 million breeding sows in Germany. About 6.4 million single doses of PMSG were administered to sows over a timespan of three years (2016 - 2019), which makes 2.1 million doses per year. This high number shows that PMSG is not only used to treat individual animals in case of anoestrus but is rather used systematically in whole groups. Furthermore, PMSG is not only used in sows for the induction and synchronisation of oestrus, but also for superovulation and the induction of puberty. Superovulation results in larger litter sizes. Surplus piglets often die or are killed when a sow does not have enough teats to feed them all. Increased litter size is evidently associated with increased piglet mortality. PMSG can also be used for the induction of puberty in young sows, but pregnancy at an early age shortens pubertal development and usually leads to early infertility and slaughter.

Thus, the production of PMSG not only raises serious welfare concerns with regard to horses, but its use also has a negative impact on the welfare of farmed animals. In fact, one animal species (horses) is exploited in order to exploit other species (mainly pigs, cattle, and sheep).

6) Numerous alternatives to PMSG are already available

According to veterinary experts, the induction and synchronisation of oestrus is also possible with zootechnical methods such as exercise, optimal nutrition and lighting, contact with sows in oestrus and boar contact. Such measures are, for instance, used in organic farming. Furthermore, there are numerous synthetic alternatives available to breeders for the induction and synchronisation of oestrus in farmed animals – 36 products in Germany alone – and their efficacy is very similar to PMSG according to different studies. As an example, in Germany there is a training project for farmers and veterinarians which transfers knowledge about alternatives to PMSG in pig breeding.

7) EU Parliament calling for a ban on PMSG import and production

In May 2020, the European Commission released its Farm to Fork Strategy, the flagship initiative under the new European Green Deal. In its communication, the EU Commission stated that "moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system".

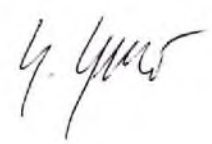
On 20th October 2021, the European Parliament adopted by a large majority a resolution on a Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system. In its paragraph 130, the European Parliament *"recalls that structural animal experiments that are not indispensable should 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"*.

It is common knowledge that industrial animal farming has many negative impacts on the environment and uses a lot of resources. According to the UN's Food and Agricultural Organization (FAO), meat and dairy production accounts for around 14.5 % of global greenhouse gas emissions.

Sustainable farming systems that work without the use of hormones already exist. According to Regulation (EU) 2018/848 that relates to the production of organic products, the systematic use of fertility hormones is not allowed in organic farming. The regulation states: *"With regard to the breeding of organic animals: reproduction shall not be induced or impeded by treatment with hormones or other substances with a similar effect, except as a form of veterinary therapeutic treatment in the case of an individual animal"* (Annex II, Part II, 1.3.2.).

As a result, I ask the Icelandic Government, on behalf of AWF and TSB, to immediately ban the blood collection from pregnant mares for economic purposes. This is the only solution to end the animal cruelty. The approval of blood collection under the label of "animal experimentation" is not legally tenable.

Sincerely,



Sabrina Gurtner
Project Manager AWF|TSB