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

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Undirrituð mælir eindregið með samþykki þessa frumvarps í heild sinni.

As the pan-European animal advocacy organisation, the primary focus of Eurogroup for Animals is to improve the well-being of as many animals as possible and defend animals' interests. We represent 82 non-governmental organisations from all over Europe and beyond.

Eurogroup for Animals supports the bill introduced to ban the production of PMSG (eCG) in Iceland. We urge the Icelandic Parliament to adopt this bill for the following reasons:

- This practice inflicts huge stress and suffering on pregnant mares but also on sows and piglets in industrial farming and can not meet animal welfare standards;
- There are alternatives in place widely available, whether synthetic to replace PMSG, or natural methods aiming at increasing fertility rates;
- The availability of alternatives indicates that the production of PMSG (eCG) is carried out in breach of EU and EEA legislation on the use of animals for scientific purposes;
- PMSG (eCG) produced in Iceland is often exported to EU countries, where the substance is used to support intensive industrial farming practices;
- Putting an end to blood farms is in line with Iceland's efforts towards a more sustainable agriculture respectful of the environment and animals.

The extraction of PMSG (eCG) raises serious animal health and welfare concerns for equines¹. The production of eCG in Iceland implies very stressful procedures for the mares, which are mainly kept for meat production and are not used to human handling². The mares are frightened when they are handled by people and restrained in boxes for a weekly collection of 5 litres of blood, which is above international recommendations^{3,4}.

¹ Manteca Vilanova, X., De Briyne, N., Beaver, B., & Turner, P. V. (2019). Horse Welfare During Equine Chorionic Gonadotropin (eCG) Production. *Animals : an open access journal from MDPI*, 9(12), 1053. <https://doi.org/10.3390/ani9121053>

² <https://www.eurogroupforanimals.org/news/iceland-animal-welfare-violations-blood-farms>

³ <https://www.nc3rs.org.uk/blood-sample-volumes>

⁴ Manteca Vilanova, X.; Beaver, B.; Uldahl, M.; Turner, P.V. Recommendations for Ensuring Good Welfare of Horses Used for Industrial Blood, Serum, or Urine Production. *Animals* 2021, 11, 1466. <https://doi.org/10.3390/ani11051466>

The production of eCG, and its trade, is not just harmful to the equines from which it is harvested, but also to the farmed animals it is used on. The hormone is most often used by pig producers to increase reproductive performance of sows through synchronizing cycles and increasing the number of piglets produced per year. Animals subjected to such practices associated with industrial animal farming suffer and have a low quality of life.

In addition, the production of PMSG (eCG) is in breach of the EEA legislation enforced through the directive on the protection of animals used for scientific purposes ([EU Directive 2010/63/EU](#)), which is based on the principle of the “3Rs” - Replacement, Reduction and Refinement. This legislation requires animal experiments – including for the manufacture of pharmaceuticals – to be “indispensable”. Such procedures can thus only be approved if there are no alternatives available. In the case of PMSG, numerous alternatives exist. A number of authorised synthetic medicinal products are available on the pharmaceutical market which makes PMSG (eCG) dispensable. It is important to note that achieving good reproductive results is also possible to some extent with informed management techniques.

Finally, citizens are willing to see the production of PMSG (eCG) banned. While there is currently no survey in Iceland, 2 millions EU citizens signed an AVAAZ petition to ban the import of cruelly produced PMSG into the EU, where animal welfare is also a strong value. It is needless to say that this support emphasises the need to finally put an end to this barbaric practice in the EU and EEA. In addition, the [EU Farm to Fork strategy](#) adopted in 2021 as part of the European Green Deal calls on the Commission and Member States to stop the production of PMSG and recalls that this practice is dispensable. Sustainable farming practices without the use of hormones are already in place. Indeed, in the EU, the use of hormones is prohibited in organic farming ([Regulation \(EU\) 2018/848](#)).

Þar af leiðandi fer ég Iwona Mertin & Léa Badoz þess á leit við stjórnvöld á Íslandi að þau banni samstundis blóðtöku fylfullra hryssa, svokallaðra blóðmera, á Íslandi.

Virðingafyllst,

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