**Sendandi: Fondation Franz Weber**

**Til nefndasviðs Alþingis**
**Dags. November 11th**

## Umsögn um frumvarp til laga um breytingu á lögum um dýravelferð, nr. 55/2013 (bann við blóðmerahaldi)

53. mál, lagafrumvarp
153. löggjafarþing 2022–2023.
Frumvarpið er endurflutt, sjá 15. mál á 152. þingi - velferð dýra.

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

**Greinargerð**

In August, the ministry introduced a new regulation on blood farming which allows the activity to continue for another three years, before a final decision on its future will be taken. However, this new regulation does not bring many changes and is clearly insufficient to protect the horses.

Our main criticism of the new regulation is:

- The blood collection quantity and frequency remain the same, namely 5 liters over 8 weeks (i.e. 40 liters in total).
- What is missing in the regulation is a provision on mandatory taming and training of mares, in order to minimise distress.
- Hemoglobin and/or hematocrit values are checked only every second year. According to veterinary experts, it is important to also measure other blood components, such as plasma proteins (albumins, immunoglobulins, coagulation factors) and nutrients.
- Only the buyer of the blood (Isteka) has to apply for a permission, the blood farmers only have to notify (report) the activity (the activity is notifiable but not subject to authorisation).
- The buyer of the blood (Isteka) is still allowed to classify payments for blood by quantity (incentive system).

Since there are systematic animal welfare problems involved in PMSG production, and since alternatives are available, **the only solution is to stop the production**.

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

**Virðingafyllst,**
**Rubén Pérez,  On behalf of the Fondation Franz Weber**