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Til nefndasviðs Alþingis
Dags. 14 November 2022

**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

Eurogroup for Animals is the pan-European animal advocacy organisation representing over 80 non-governmental organisations promoting animal welfare from all over Europe and beyond.

Eurogroup for Animals already provided comments to support the bill introduced to ban the production of PMSG (eCG) in Iceland in January 2022. We again urge the Icelandic Parliament to adopt this bill for the following reasons:

- the practice inflicts huge stress and suffering on pregnant mares but also on sows and piglets in industrial farming and cannot meet animal welfare standards;
- there are alternatives in place widely available, whether synthetic to replace PMSG, or natural methods aiming at synchronising oestrus and increasing fertility rates;
- the availability of alternatives indicates that the production of PMSG is carried out in breach of EU and European Economic Area (EEA) legislation on the use of animals for scientific purposes (3 Rs principle);
- PMSG produced in Iceland is often exported to EU countries, where the substance is used to support intensive industrial farming practices, incompatible with the objectives of the European Green Deal, including the Farm to Fork Strategy;
- 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 raises serious animal health and welfare concerns for equines¹. While South American countries have in the past been the main provider of PMSG, recent animal welfare scandals have led European pharmaceutical companies to source PMSG from Iceland. On Icelandic blood farms, force is used to move semi-wild mares into restraint boxes, where they remain tethered throughout the procedure. It is very stressful for the mares which are mainly kept for PMSG and meat production and are not used to human

¹ Manteca Vilanova, X., Beaver, B., Uldahl, M., Turner, P.V. (2021). Recommendations for Ensuring Good Welfare of Horses Used for Industrial Blood, Serum, or Urine Production. *Animals*, 11(5):1466. <https://doi.org/10.3390/ani1105146>.

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 far above international recommendations³.

PMSG production in the EU and European Economic Area (EEA) falls under Directive 2010/63/EU on the protection of animals used for scientific purposes as this legislation covers procedures for the manufacture of drugs. The Directive is based on the principle of the 3 Rs: replacement, reduction and refinement. This means that the use of animals for scientific purposes is only acceptable when there is no alternative available. However, methods for the production of PMSG produced in vitro (called reCG), have proved viable. Most importantly, several synthetic alternatives to PMSG are already available on the EU market, besides zootechnical measures, making PMSG use totally dispensable and its production in the EU and EEA in breach of Directive 2010/63/EU. In Iceland, Directive 2010/63/EU has been transposed in the national legislation on animal experimentation, Regulation 460/2017.

Acknowledging this situation, in March 2022, Eurogroup for Animals, jointly with 16 animal protection organisations, among which several are based in Iceland, filed an official complaint with the EFTA Surveillance Authority. We argue that Iceland does not properly apply its legislation on the protection of animals used for scientific purposes, which is derived from the EU Directive on the same topic. Indeed, Iceland, as a member of the European Free Trade Association (EFTA), must follow the rules of the EEA, most of which are aligned with EU rules.

Besides, the European Parliament called on the European Commission and EU Member States to stop the import and production of PMSG in the [Resolution on a Farm to Fork Strategy](#) published in 2021 (point 130). The text highlights that “*animal experiments that are not indispensable should have no place in the food chain*” as prescribed by Directive 2010/63/EU. The European Parliament reiterated this message in a [Motion for Resolution on a coordinated Union-level Action Plan to facilitate the transition to innovation without the use of animals in research, regulatory testing and education](#) (point 16).

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

Virðingafyllst,
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² <https://www.eurogroupforanimals.org/news/iceland-animal-welfare-violations-blood-farms>; Animal Welfare Foundation. “Production of PMSG in Iceland”. Available at:

<https://www.animal-welfare-foundation.org/service/dossiers/production-of-pmsg-in-iceland>.

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