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## Umsögn um frumvarp til laga um breytingu á lögum um dýravelferð, nr. 55/2013 (bann við blóðmerahaldi) 53. mál, 153. löggjafarþing 2022–2023

Written by Sabrina Gurtner, Project Manager at Animal Welfare Foundation and Tierschutzbund Zürich  
Zurich, 15.11.2022

**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.

From our point of view, the new regulation on blood collection from pregnant mares, introduced by the agriculture ministry on 3rd August 2022, fails in various respects and does not protect the mares used for the production of PMSG :

- **Untamed horses:**  
A provision on mandatory taming and training of mares is not included in the regulation. However, blood cannot be taken from semi-wild and untamed horses without using force and causing stress and fear.
- **High amounts of blood volume:**  
The allowed blood volume and frequency of five litres per week<sup>1</sup> over eight weeks highly exceed all existing international guidelines.<sup>2,3,4</sup> It is important to note that these recommendations apply to non-pregnant horses, whereas the mares used for PMSG production in Iceland are both pregnant and lactating.
- **Insufficient blood measurements:**  
Haemoglobin and/or haematocrit values are checked only every second year. This scope and frequency are insufficient. According to veterinary experts, it would be important to also measure other blood components, such as plasma proteins, iron and other nutrients.

With the new regulation, **systematic problems** involved in high-volume blood collection from semi-wild, pregnant mares **remain unsolved**.

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<sup>1</sup> Five litres represent 15 - 20 % of the total blood volume of an Icelandic horse.

<sup>2</sup> [Blood sampling: General principles | NC3Rs](#)

<sup>3</sup> [Animals | Free Full-Text | Recommendations for Ensuring Good Welfare of Horses Used for Industrial Blood, Serum, or Urine Production \(mdpi.com\)](#)

<sup>4</sup> [Leitlinien Blutprodukte BVL](#)

Furthermore, there is **no necessity or ethical justification** to obtain PMSG from pregnant mares, since alternatives to PMSG are already available. **Zootechnical methods** such as exercise, optimal nutrition and lighting, contact with sows in oestrus and boar contact are already used in pig breeding, in particular in organic farming. Veterinary experts confirm that the induction and synchronisation of oestrus is possible with the above mentioned zootechnical methods or with the use of **synthetic alternatives**, of which 36 products are available in Germany alone<sup>5</sup>. Their efficacy is very similar to PMSG according to different studies and practical experience of breeders.

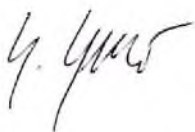
Moreover, from today's perspective, **PMSG is no longer contemporary**. It is a hormone from the ideology of the 80's. The idea at the time was to ensure food security for the population with cheap pork. Today, the **massive negative effects of factory farming on animal welfare, human health, climate and environment** are well known. The European Parliament is calling for a ban on PMSG import and production. A ban on PMSG would follow the logic of the *European Green Deal* and its *Farm to Fork Strategy* and would be in line with the "green" and progressive image that Iceland likes to convey.

We would like to recall that the production of PMSG in Iceland is **in breach of the laws applying in the European Economic Area (EEA)**<sup>6</sup>. 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.

**In our opinion, the new regulation is insufficient to protect the mares and to control the blood business. With today's knowledge, PMSG production is out of date. The only solution is to stop the production. This would also avoid a damage to the image of the agricultural sector of Iceland.**

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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<sup>5</sup> [Synthetic alternatives in Germany](#)

<sup>6</sup> [www.eurogroupforanimals.org/news/blood-farms-iceland-official-efta-complaint-filed](http://www.eurogroupforanimals.org/news/blood-farms-iceland-official-efta-complaint-filed)