



Metz, France, November 16<sup>th</sup>, 2022

Sent by e-mail to: [nefnasvid@althingi.is](mailto:nefnasvid@althingi.is)

**Sendandi:** Adrienne Bonnet, on behalf of Welfarm

**Til nefndasviðs Alþingis**

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

*Written by Adrienne Bonnet*

*Head of the Campaign, Advocacy and Legal department of Welfarm*

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**

I, the undersigned, strongly recommend the adoption of this bill about the modifications to the Regulation on animal protection no.55/2013 (prohibition of blood collection in blood farms) for the reasons presented below.

Indeed, as a French charity created in 1994 and specialized in the protection of farm animals, Welfarm supports the bill to ban the business of blood collected from pregnant mares for PMSG production. Our NGO already participated to the consultation of last January and it strongly reiterates its intention to see this activity prohibited.

Scientific research and investigations are unanimous on the matter. The collection of blood from mares is synonymous of stress and suffering. Consequently, only a ban would allow to protect the mares and the other animals involved -directly or indirectly- in the process. The new Icelandic regulation adopted on August 3 which aim is to regulate the blood farming is totally inadequate to ensure animal welfare.

Since the mares are semi-wild animals, the risks of injury and pain are multiple. In this regard, the regulation of August 2022 missed the opportunity to provide a mandatory taming and training of mares to minimise their fear. Additionally, the blood collection quantity and frequency remain the same which is incompatible with the slightest consideration for the welfare of mares. By collecting 5 liters of blood over 8 weeks, the renew of mares' blood stock between two operations is still impossible.

We also regret the lack of controls provided by the regulation of August 2022. The activity of the blood farmers is indeed not subject to any authorisation since only Isteka, as a buyer, must apply for a permission. This is insufficient to guarantee that the collection of blood is done with respect for the animals and to regulate this significant activity.

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Furthermore, the fact that hemoglobin and/or hematocrit values must be checked only every second year is insufficient both in terms of intervals and contents of the checks. We are convinced that the checks must be more frequent and that other blood components need to be evaluated. This is the case of plasma proteins (albumins, immunoglobulins, coagulation factors) and nutrients.

Another issue is that the current system is designed as an incentive one, by allowing Isteka to classify payments for blood by quantity. This is morally unacceptable considering that it is based on animal suffering.

Some alternatives to replace PMSG exist. Natural methods should be prioritized, such as the one involving the placement of males into the environment of females in order to stimulate their ovarian activity. The aim of increasing fertility rates could be met with such an hormones-free method. Thus, the availability of such alternatives indicates that the production of PMSG is carried out in breach of EU and EEA legislation on the use of animals for scientific purposes.

For all the aforementioned reasons, a ban on the production of PMSG hormone appears to be the only solution to protect the welfare of animals as well as to ensure a more sustainable agriculture not only in Iceland, but also in third countries or regions, like the European Union.

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

That's the reason why I, Adrienne Bonnet, am asking the Icelandic government to immediately ban the bloodletting of pregnant mares, called blood mares, in Iceland.

**Virðingafyllst,**  
Sincerely yours,

**Adrienne Bonnet**  
Head of the Campaign,  
Advocacy and Legal  
Department of Welfarm