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EUROGROUP
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Dier&Recht
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animaleQUALITY



ANIMAL PROTECTION
DENMARK



Viva!



Attn:

Commissioner Stella Kyriakides

Stella.KYRIAKIDES@ec.europa.eu

Brussels, 6th December 2021

Dear Ms Kyriakides,

The shocking footage taken at 'blood farms' in Iceland, which has been made public by Animal Welfare Foundation (AWF) and Tierschutzbund Zürich (TSB), shows a cruel business that has been operating for decades under the supervision of Icelandic authorities. On these farms, blood is taken from pregnant mares to obtain the hormone PMSG, also called eCG. These blood collections happen under unacceptable conditions and in breach of Icelandic animal welfare law. As the EU is a major buyer of PMSG from Iceland, **we call on the European Commission (EC) to follow through with the demand made by the European Parliament (EP) and impose a ban on the domestic production and imports of PMSG, as stipulated in the EP's resolution on a Farm to Fork strategy¹.**

PMSG (Pregnant mare serum gonadotropin) is extracted from the blood of mares during early pregnancy. It is used in industrial animal breeding to increase the fertility of farmed animals - in particular sows, but also cattle, sheep, and goats - through synchronising cycles and increasing the number of offspring produced per year. Most of the mares used for PMSG production are untamed and not accustomed to human handling. This leads to stress in the mares, which is intensified by cruel handling. It is not possible to take blood from semi-wild horses without using force or causing fear. Even the frequent blood collection in mares which are familiar with people can cause high levels of stress, in addition to health risks such as venous thrombosis.

¹ "The European Parliament recalls that structural animal experiments that are not indispensable should have no place in the food chain as Directive 2010/63/EU prescribes the replacement and reduction of the use of animals in procedures; calls on the Commission and Member States to stop the import and domestic production of Pregnant Mare Serum Gonadotropin (PMSG), which is extracted from the blood of pregnant horses that are systematically impregnated and exposed to blood collections, involving health and welfare issues;" (P9_TA(2021)0425)

PMSG production in Iceland leads to the mistreatment of horses

The film recently published by AWF and TSB documents the massive animal welfare violations that have occurred in Iceland. The investigation, which was carried out between 2019 and 2021, found 40 blood farms, none of which had suitable infrastructure for safe blood collection. Indeed, the installations create high risks of injuries to the mares, for example gaps in the restraint boxes, sharp edges on walls, slippery floors in the raceways and restraint boxes. A total of 119 blood farms are currently in operation in Iceland, exploiting around 5,300 blood mares.

Five liters of blood is extracted weekly from each mare, for five to eight consecutive weeks. This results in mares losing 15 to 20 % of their total blood volume each week. During this period, in addition to being in-foal, mares are also nursing their other foals, and as a result they become extremely exhausted. The amount and frequency of blood collections in Iceland significantly exceeds all existing recommendations for non-pregnant and non-lactating horses, let alone mares that are both pregnant and lactating. Additional issues include mares being exposed to extremely violent treatment. The footage from Iceland shows workers beating the mares with iron rods, with whips and wooden planks to force them into the restraint boxes. The mares are also herded and bitten by dogs, which adds to their fear. Often, they panic inside the restraint boxes and struggle to get free, lose their footing, and fall down. Even exhausted mares who are lying on the floor are hit in the face by the workers, as they make the stressed mares get up ([full documentary available here](#)).

PMSG production in breach of EU legislation with EEA relevance

In the EU and also in Iceland, blood collection for the manufacture of drugs is classified as an animal experiment. The Icelandic legislation on animal testing derives from EU Directive 2010/63, which is based on the principle of the 3 Rs: replacement, reduction and refinement. According to this principle, animals may only be used in animal experiments if there are no alternative methods available. However, PMSG - the result of the experiment - is not indispensable since there are numerous alternative methods available to breeders for the induction and synchronisation of oestrus in farmed animals, including husbandry management practices and zootechnical measures, in addition to synthetic hormones. Therefore, the commercially conducted blood collections from pregnant mares are unlawful and they should not be approved by the authorities, in the EU or in Iceland.

In 2019, the EC recognised it was concerned about the mistreatment of horses farmed to produce PMSG in third countries. At the time, the EC declined to impose an import ban on PMSG, as it believed other measures were more adequate to improve the welfare conditions of the horses involved.² Since then, the EC has launched the European Green Deal and its new Food Policy - From Farm to Fork, which aim for a shift towards more plant-based diets and the improvement of welfare for farmed animals. The systematic use of fertility hormones like PMSG goes against the objectives laid down by such texts. The perceived need for the use of PMSG mostly indicates inadequate animal management. Veterinarians can assist farmers with focusing on better animal welfare, making PMSG usage superfluous.

The publication of the documentary film has caused a public outcry in Iceland. Most people were not aware of the blood business and are horrified by the treatment of the horses they are so proud of. Attached to this letter is a list of media reports from both Iceland and abroad. You will also find attached a detailed dossier on the investigations carried out in Iceland between 2019 and 2021 (for internal use only). We hope you can pay special attention to chapter IV, which presents the

² https://www.europarl.europa.eu/doceo/document/E-9-2019-004569_EN.html

conclusions and our calls. To a certain extent, the welfare of horses in Iceland is also in the hands of the EU regulator³.

Considering the situation on blood farms - even in Iceland - and the clear call sent by elected representatives from the EP in their recent resolution on the Farm to Fork strategy, **we urge the EC to review its position on this matter and impose a ban on both production and imports of PMSG.**

Yours sincerely,

Stephanie Ghislain, Eurogroup for Animals, Brussels

Sabrina Gurtner, Animal Welfare Foundation / Tierschutzbund Zürich, Germany / Switzerland

Sarah Pesie, Dier&Recht / Varkens in Nood, Netherlands

Esther Müller, Deutscher Tierschutzbund e.V., Germany

Sonny Richichi, Italian Horse Protection IHP, Italy

Anna Spurek, Green REV Institute, Poland

Adrienne Bonnet, Welfarm, France

Rubén Pérez, Fundación Franz Weber, Spain

Sonja Meadows, Animals' Angels Inc., United States

Sinikka Crosland, Canadian Horse Defence Coalition, Canada

Anne Sofie Meilvang, Dyrenes Beskyttelse, Denmark

Chiara Caprio, Animal Equality, Italy

Laura Lisa Hellwig, Viva, United Kingdom

Paweł Rawicki, Stowarzyszenie Otwarte Klatki, Poland

Attachments:

- AWF | TSB Dossier about PMSG production in Iceland (for internal use only – do not pass on to third parties without written approval by AWF)
- Media coverage in Iceland and international
- Statement from FEIF (International Federation of Icelandic Horse Associations), addressed to Dagmar Trodler, a journalist of Iceland Review

³ A ban on the domestic production of PMSG would most likely have EEA relevance (European Economic Area). The piece of legislation that applies to PMSG production within the European Union - EU Directive 2010/63 on the protection of animals used for scientific purposes - applies to all EEA countries. Since Iceland is member of the EEA, a prohibition in the context of this legislation would have to be implemented in its national law.