



Dier&Recht
advocaat van de dieren

Please reply to:

Animal Welfare Foundation e.V.
Basler Straße 115
79115 Freiburg i. Br.
Germany
s.gurtner@awf-tsb.org

European Commission
Cabinet of Commissioner Olivér VÁRHELYI
Rue de la Loi 200
1040 Bruxelles

Freiburg, 28 May 2025

PMSG/eCG: NGO investigations in Iceland

Dear Commissioner Várhelyi,

We are reaching out to you today to inform you about a recent investigation into the production of the fertility hormone PMSG/eCG¹ in Iceland, carried out by the Animal Welfare Foundation (AWF) and Tierschutzbund Zürich (TSB). We take this opportunity to renew our call for a ban on PMSG, which is long overdue and has been demanded by animal welfare organisations and the European Parliament for years. PMSG serves purely economic interests. The use of fertility hormones in sows without medical indication, and the use of pregnant mares for the production of PMSG is contrary to animal welfare. We therefore urge the Commission to follow the European Parliament's call from 2021² and to initiate the following bans:

- **Ban on PMSG production:** Legal opinions have considered the collection of blood for PMSG production as a non-essential and therefore unlawful animal experiment³ ⁴. As a first step, the European Commission should officially acknowledge and recognise that PMSG production is in breach of EU legislation (Directive 2010/63/EU on the protection of animals used for scientific purposes) and clarify this in official communication to the Member States. As a second step, the Commission should explicitly prohibit the production in the EU, within the revision of the EU animal welfare legislation ("Kept Animals Regulation" and/or the tertiary legislation on equine welfare).

¹ Pregnant Mare Serum Gonadotropin / equine Chorionic Gonadotropin

² www.europarl.europa.eu/doceo/document/TA-9-2021-0425_EN.html (point 130)

³ Ogorek M 2021: Wissenschaftliche Stellungnahme zur Frage der Rechtmäßigkeit von großvolumigen Blutentnahmen bei trächtigen Stuten zur Gewinnung des Hormons PMSG. Universität zu Köln.

⁴ [Schäffer L 2021: Zulässigkeit von Blutentnahmen bei trächtigen Stuten nach nationalem Recht im Gebiet der Bundesrepublik Deutschland. Amtstierärztlicher Dienst und Lebensmittelkontrolle. 28. Jahrgang – 3 / 2021](#)

- **Ban on the import:** A legal opinion from Germany concludes that trade restrictions are permissible for reasons of animal protection and safeguarding public morals, thus suggesting that an import ban would therefore be possible⁵.
- **Ban on the use:** As alternative methods are available, the use of PMSG is not essential⁶. In addition, the use of PMSG has negative effects on pigs. PMSG cannot be considered a medicinal product, firstly because it is used systematically without a medical indication and secondly because medicinal products must heal or at least maintain health and not have the opposite effect.

The report and film of the recent investigation in Iceland (September 2024) include a scientific commentary on the documented animal welfare problems during blood collection by Professor Stephanie Krämer from Justus Liebig University in Germany. These are systematic problems caused by the fact that blood is taken from semi-wild, pregnant mares with foals at foot that rarely have contact with humans. Mares and foals are beaten, whipped, kicked and poked with wooden planks. Foals often get separated from their mothers and search for them in panic. The mares are restrained in narrow boxes with their heads tied up high, which causes great stress and fear in flight animals. The inadequate infrastructure and restraining techniques pose numerous risks of injuries, in particular when mares rear back in panic or try to escape. The insertion of the large-bore cannula is painful. The vets sometimes poke around in the veins for several minutes, even on both sides of the neck.

We kindly ask you to pay special attention to the Chapters IV, VIII and IX of the report (download [here](#)) and to watch the film of the investigation (view [here](#)).

5 litres of blood are taken weekly, for a period of 8 weeks, from mares that are both pregnant and lactating. This is about 15-20 % of the mares' total blood volume, which far exceeds the amount and frequency of international standards for blood collection from non-pregnant horses. This may cause harm to the mares and their unborn foals.

AWF and TSB have been documenting the abuses on Icelandic blood farms since 2019. The promises made by the pharmaceutical company Isteka and the self-monitoring by the contract veterinarians have not been suitable for preventing further massive animal suffering. The new footage provides evidence of the systematic cruel treatment of horses on Icelandic blood farms. These are not isolated incidents. Severe animal abuse and the use of force are common practice. The amount and frequency of blood collection and the treatment of the horses during the process are in breach of their welfare. Blood farms are cruel to animals and should be banned by law.

Blood farms no longer exist anywhere in Europe, other than Iceland. The activity is in breach of EU legislation⁷. Despite an EFTA infringement procedure⁸, Iceland will continue to bleed mares this summer/autumn and will only re-evaluate the situation in October, after this year's blood collection period. Even if Iceland will take the decision to ban PMSG production, it is still very important that the EU imposes a ban on the import of PMSG, in order to avoid imports of the cruelly produced hormone from countries such as China, Argentina or Uruguay.

⁵ [Bülte J, Felde B, Maisack C 2022: Reform des Tierschutzrechts - Die Verwirklichung des Staatsziels Tierschutz de lege lata. Das Recht der Tiere und der Landwirtschaft Band 12](#)

⁶ www.bundestieraerztekammer.de/tieraerzte/stellungnahmen/

⁷ Directive 2010/63/EU on the protection of animals used for scientific purposes

⁸ www.eftasurv.int/newsroom/updates/iceland-breach-eea-rules-protection-animals-used-scientific-purposes-regards-blood

In addition to raising serious welfare concerns with regard to horses, the use of PMSG also has a negative impact on the welfare and health of farmed animals. Indeed, one animal species is used to exploit another. The mares' hormone is used to boost productivity and efficiency in industrial farming. It promotes unnatural rates of reproduction in farmed animals and gives them no time to recover in between pregnancies, which can lead to severe health issues and early slaughter as a consequence. PMSG also induces superovulation, which may result in larger litter sizes in pigs. The greater the number of piglets, the higher the risk of animals being born weak or dead. PMSG is used in modern high-performance breeds that give birth to too many piglets anyway and aggravates this problem.

According to veterinary and breeding experts, PMSG can be used to cover up management problems or health issues of animals. The hormone can compensate for errors in management, animal observation, housing and feeding. With PMSG, problematic pig farms can still operate efficiently. There are clearly no benefits for the animals that are injected with PMSG. On the contrary, harm is caused not only to the horses used for PMSG production but also to the animals treated with the hormone. Furthermore, there are multiple alternatives available to synchronise reproduction – among them natural methods – that make it possible to replace PMSG in line with the principle of the 3 Rs.

The recent investigation in Iceland shows that it is high time for the Commission to act and follow the Parliament's request. Industrial farming systems which rely on the use of PMSG follow an outdated ideology and go against the objectives of the *European Green Deal* and the *Farm to Fork Strategy*, which aim to move towards more sustainable food systems, reduce greenhouse gas emissions and improve animal welfare.

We are looking forward to your reply.

Yours sincerely,

Sabrina Gurtner, Animal Welfare Foundation, Germany

York Ditfurth, Tierschutzbund Zürich, Switzerland

Stephanie Ghislain, Eurogroup for Animals, Brussels

Joh Vinding, Anima, Denmark

Alanna Devine, Animal Justice, Canada

Juan Echavarria, Animales sin Hogar, Uruguay

Sonja Meadows, Animals' Angels, USA

Sarah Pesie, Dier&Recht, Netherlands

Claire Owens, DSPCA, Ireland

Andrés Ingi Jónsson, Dýraverndarsamband Íslands, Iceland

Rubén Pérez Sueiras, Fundación Franz Weber, Spain

Alejandra Garcia, Fundación Franz Weber, Argentina

Sonny Richichi, Italian Horse Protection IHP, Italy

Ghislain Zuccolo, Welfarm, France