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

Freiburg, 18th December 2025

NGO investigations in Argentina & Uruguay – ban on PMSG/eCG urgently needed

Dear Commissioner Várhelyi,

As follow-up to our letter dated 28 May 2025 concerning blood farms in Iceland, to which we have not yet received a response, we would like to inform you about a recent investigation in South America and renew our urgent request to ban the fertility hormone PMSG/eCG[1].

Over 10,000 mares are exploited for the production of PMSG in Argentina and Uruguay. During a period of approx. 11 weeks, up to 10 litres of blood are drawn from the mares every week. The new investigation, carried out by the Animal Welfare Foundation (AWF) and Tierschutzbund Zürich (TSB) between 2023 and 2025, shows that the cruel conditions at South American blood farms remain unchanged since they were first exposed in 2015, despite promises made by pharmaceutical companies and authorities to improve the situation with new manuals and audits. The handling by the workers remains unprofessional and violent. They hit the mares, stab their bodies and genitals, pull their ears, and kick stones at them. The frightened horses are forced into raceways and boxes, where they are tied down with ropes so that the bloodletting cannula can be inserted. The mares resist, try to escape, kick against the boards of the boxes, which often leads to injuries. The investigation shows that injured, sick and emaciated mares are left unattended in vast pastures instead of receiving veterinary care. Adequate nutrition, sufficient fresh water and shelter from the weather are still lacking. Abortions are still a standard procedure, so that the mares can be impregnated for a second time in the same year.

[1] Pregnant Mare Serum Gonadotropin / equine Chorionic Gonadotropin

The investigation findings are summarised in a two-year report (download here). We kindly ask you to pay special attention to the Chapters I and IX of the report and to watch the film of the investigation (view here).

The new investigation focuses, among other things, on the Argentinian company Syntex and its subsidiary in Uruguay. In 2018, Syntex lost all their European customers who had previously purchased pure PMSG powder for further processing, among them Ceva Santé Animale. In 2020, Syntex founded the company Syn Vet-Pharma Ireland Limited in Ireland for the distribution of its PMSG product Fixplan in Europe and has obtained individual marketing authorisations in 10 member states through this company. Through the back door of a branch in Ireland, Syntex is bringing PMSG into the EU, the extraction of which would not be approvable under EU animal welfare standards.

This approach shows that self-imposed import suspensions by the industry are ineffective. As long as there is no official ban on this cruelly produced hormone, suppliers from third countries such as Chinese manufacturers of the active ingredient are likely to fill the gap left by European countries. The German Federal Government acknowledged this in its response to a parliamentary question.

The Commission sent a mandate to the European Food Safety Authority (EFSA) to request a scientific opinion on equine welfare, which will cover PMSG production and is expected to be delivered in 2026. According to the Commission's answer to a parliamentary question (E-002041/2025), "appropriate follow-up on the matter" will be considered by the Commission based on the EFSA opinion and recommendations. While we welcome the inclusion of PMSG production in the EFSA scientific opinion, we urge you to take immediate action and initiate the following bans, which we already outlined in our letter of 28 May:

- **Ban on PMSG production:** Legal opinions have considered the collection of blood for PMSG production as a non-essential and therefore unlawful animal experiment[2]. As an immediate 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 modernisation process of the EU animal welfare legislation.

- **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 be possible.

- **Ban on the use:** Veterinary associations confirm that the use of PMSG is not essential, as alternative methods are available. 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.

A resolution passed by the European Parliament in 2021 calls on the European Commission to ban the import and domestic production of PMSG. It is time for the Commission to comply with the Parliament's request. The extraction of the hormone PMSG from the blood of pregnant mares is a massive violation of European animal welfare standards. The import of the fertility hormone into the EU is partly responsible for the suffering and

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

death of thousands of mares and foals in Uruguay and Argentina. It is no longer acceptable for the EU to allow the import and production of this fertility hormone which is not even needed.

We are looking forward to your reply at your earliest convenience.

Yours sincerely,

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