

Attn:**Minister of Industries and Innovation**

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Copy to:

Commissioner Olivér Várhelyi
EFTA Surveillance Authority-ESA
Ceva Santé Animale & main investors
MSD Animal Health and primary shareholders

Brussels, 24 February 2026

OPEN LETTER: Open call to enforce the EU legislation in the horse blood extraction industry in Iceland

Minister, MAST Director and CVO

We, animal protection NGOs from the EU and Iceland, are writing to you to call for the proper enforcement of EU/EEA legislation on the horse blood extraction industry in Iceland.

The eCG (equine Chorionic Gonadotropin, also called PMSG: Pregnant Mare Serum Gonadotropin) is a hormone obtained from the blood of pregnant mares (horses) that stimulates fertility in particular in intensive pig and sheep breeding.

The main production of eCG for the European market takes place in Iceland, where the pharmaceutical biotechnology company Ísteka seeks to reclassify its high-intensity blood collection operations as "*traditional agriculture*" rather than a "*scientific procedure*" to bypass the critical protection for animals mandated by [Directive 2010/63/EU](#) (further called the Directive) under which, according to the [European Commission, this procedure falls](#).

The EFTA Surveillance Authority (ESA) similarly concluded that [Iceland was in breach of EEA rules](#) by failing to apply the Directive to blood extraction from pregnant mares and Iceland was compelled to apply Regulation 460/2017 on the protection of animals used for scientific purposes in order to bring national law into alignment.

The extraction of high volumes of blood for pharmaceutical manufacturing is a scientific use under **Article 5 (c)**, and the use of large needles (*requiring anesthesia*) meets the pain threshold of **Article 3 (1)** of the Directive. Unlike traditional farming, these mares are not primarily bred for food but used as biological repositories of a pharmaceutical raw material. Extracting blood to produce a hormone is not a "*recognised husbandry*" practice any more than producing antibiotics would be (**Article 1(5) (a) & (d)** of the Directive). Such blood extraction constitutes a procedure for the purpose of

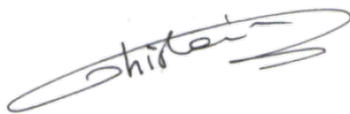
manufacturing drugs that *regulates/modifies physiological conditions in animals* (**Article 5 (b) ii & (c)**) since the hormone extracted from pregnant mares' blood (eCG) is used for the induction and synchronisation of oestrus in farmed animals.

Characterizing blood extraction on an industrial scale as a "*farm sideline*", as per [Ísteka's wording](#), comparable to milking or sheep shearing, deliberately masks the industrial dimension of the process.

In the light of the above, we urge you to ensure a proper enforcement of the existing EU/EEA rules as laid out by the [Commission](#) and as requested by the European Parliament ([Point 130](#)) for the continued recognition of blood extraction from pregnant mares as a procedure under [Directive 2010/63/EU](#) and stand by the EFTA Surveillance Authority's (ESA) formal position as accepted and implemented by the Icelandic Food and Veterinary Authority (MAST) that this practice constitutes a scientific use of animals.

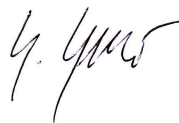
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