



c/o Wildlife Conservation Society
Boulevard Louis Schmidt 64
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Brussels
Belgium

Brussels, 10th June 2015

Dear Minister,

Subject: Raising Concern about the Risks Veterinary Diclofenac poses to European Vultures in advance of an EU discussion on Monday 15th June 2015

As the Minister responsible for nature protection, we are writing to draw your attention to the veterinary use of the drug diclofenac within the EU and the risk this poses to vultures and other birds of prey, **in advance of a discussion in the EC Standing Committee on Veterinary Products on Monday 15th June.**

The scientific community has warned that the drug diclofenac is extremely toxic to vultures, as upon ingestion it causes renal failure and death within a few daysⁱ. In addition, diclofenac breaks down very slowly in cattle and pigs, which means that even after several days an animal dosed with diclofenac is still very dangerousⁱⁱ. As a result, a single animal with a high exposure of the drug can kill a large number of vultures. Veterinary use of the drug was responsible for a 99 % decline of vultures in India, Nepal and Pakistan in less than a decadeⁱⁱⁱ leading to a ban in several Asian countries.

As scavengers, vultures play a vital ecological role and a sudden decline in their numbers can have unforeseen consequences. As they declined in India, for example, exposed livestock carcasses became available to less efficient scavengers, leading to an increase in feral dog populations. This in turn, resulted in a heightened risk to human health, with an increase in the spread of diseases like rabies. The loss of vultures can therefore lead to a cascade of unpredictable ecological impacts.

The Convention of Migratory Species, an important treaty to which both the EU itself as well as all EU Member States are Parties, adopted Guidelines to Prevent the Risk of Poisoning to Migratory birds in 2014, in which it recommended banning the veterinary use of diclofenac as one of the most severe causes of poisoning worldwide^{iv}. In its November 2014 meeting, the World Organisation on Animal Health (OIE) working group on Wildlife Health expressed concern about Spain's decision to allow the use of veterinary diclofenac and also recommended a ban^v.

The European Commission and Member States have always taken a leading role internationally in halting biodiversity loss. In this respect it is important to highlight that four vulture species found in Europe are already vulnerable to threats. The Egyptian Vulture is threatened with extinction, and listed as 'Endangered' on the IUCN Red List of Species, partially because of the devastating effects of the diclofenac on the species in India. The Cinereous Vulture and Bearded Vulture are currently listed as 'Near Threatened' and the Griffon Vulture has recovered from very low populations after decades of conservation efforts by several EU Member States and the EU. All European vultures are protected under the Birds Directive (2009/147/EC). Since 1996, the EU and national governments have invested significant financial resources on their conservation, with at least 67 LIFE projects related to these species – between 2008 and 2012, the EU spent €10.7 million on nine vulture conservation projects alone. Supplementary feeding of vultures has, together with nest protection and habitat restoration, been instrumental in their recovery.

Diclofenac is only authorised for veterinary use in a small number of EU countries, but we are particularly concerned by the authorisation of its use in Spain, which harbours a significant proportion of the EU's vulture population. This is despite the fact that a safe alternative is available, as the drug meloxicam has been tested and shown to have comparable veterinary properties, without any negative impacts on vultures.

Due to the known dangers of diclofenac as a veterinary drug, the European Commission has asked those Member States which authorise its use to provide them with a national action plan for risk mitigation measures to be discussed by the European Commission and Member States on Monday 15th June in the Standing Committee on Veterinary Products. We are, however, concerned that risk mitigation measures will not be enough to prevent impacts on vultures. Inadequate knowledge or implementation at the farm level could result in unsafe livestock carcasses being used at feeding stations; animals that die in the field are unlikely to be removed before vultures arrive; and/or contaminated livestock carcasses may be inaccessible and impossible to find or remove. Even infrequent lapses could have dramatic consequences, with scientific modelling showing that contamination of fewer than 1% of carcasses, would have been sufficient to cause the declines seen in South Asia. Evidence that such mitigation is unlikely to be effective is already available within Europe, where the carcass of a Griffon vulture collected in Spain was shown to contain toxic residues of another veterinary drug (flunixin) and where the route of exposure would have been from contaminated cattle carcasses^{vi}.

We therefore believe that the only way to prevent a further problem is to ban the use of veterinary diclofenac across the EU. Not only would this be quick and easy to implement because it is only authorised in a small number of countries and a safe alternative drug is already available, but it would also send a strong message to other countries outside of the EU. **We therefore ask you to highlight your concern about this issue on behalf of your Member State and request the Standing Committee representative to recommend a Referral procedure under Article 35 of Directive 2001/82/EC to allow the European Medicine Agency to do an in-depth examination of the risks associated with the veterinary use of diclofenac and other non steroidal anti-inflammatory drugs (NSAIDS) for vultures and other bird species.**

We thank you in advance for taking this issue into consideration and please do not hesitate to contact us if we can provide any further information.

Yours sincerely,



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Wildlife Conservation Society (WCS)



Dr. José Tavares
Director
Vulture Culture Foundation (VCF)



Sonja Van Tichelen
European Regional Director
International Fund for Animal Welfare (IFAW)

ⁱ Pain, D.J., Bowden, C.G.R., Cunningham, A.A., Cuthbert, R., Das, D., *et al.* 2008. The race to prevent the extinction of South Asian vultures. *Bird Conservation International*, 18: S30– S48.

ⁱⁱ http://www.ema.europa.eu/docs/en_GB/document_library/Maximum_Residue_Limits_-_Report/2009/11/WC500013751.pdf

ⁱⁱⁱ Prakash *et al.* 2012. The Population Decline of *Gyps* Vultures in India and Nepal Has Slowed since Veterinary Use of Diclofenac was Banned. *PLoS ONE*, 7(11): e49118. doi:10.1371/journal.pone.0049118

^{iv} <http://www.cms.int/en/document/review-and-guidelines-prevent-poisoning-migratory-birds>

^v See page 11 of the November 2014 Meeting minutes <http://www.oie.int/en/international-standard-setting/specialists-commissions-groups/working-groups-reports/working-group-on-wildlife-diseases/group-meetings-reports/>

^{vi} Zorrilla, I., Martinez, R., Taggart, M.A., Richards, N., 2015. Suspected flunixin poisoning of a wild Eurasian griffon vulture from Spain, *Conservation Biology*, 29, 587–592