



EAZA Executive Office

c/o Artis Royal Zoo
PO Box 20164
1000 HD Amsterdam
The Netherlands

Phone: +31 20 520 0750
Fax: +31 20 520 0752
Email: info@eaza.net
Website: www.eaza.net

Tonio Borg
Commissioner for Health
European Commission
Rue de la Loi, 200
B - 1049 Brussels

Amsterdam, 5 May 2014

Re: Veterinary use of diclofenac

Dear Commissioner Borg,

We contact you today to express our deep concern about the authorisation of the drug diclofenac for veterinary use in Spain and Italy and to inform you that we fully support the initiatives of Birdlife International, the Vulture Conservation Foundation and the Vulture Specialist Group of the IUCN Species Survival Commission in raising policy-makers' awareness about the deadly consequences of this drug on vulture populations in Europe.

EAZA, the European Association of Zoos and Aquaria, is a not-for-profit association which represents and links 345 institutions in 41 countries (of which 26 are EU members). Our mission is to facilitate cooperation within the European zoo and aquarium community towards the goals of conservation, education and research.

By ensuring that its member zoos and aquariums achieve and maintain the highest standards of care and breeding for the species they keep, EAZA empowers European citizens to learn about and contribute to European and global biodiversity conservation goals. It is estimated that more than 140 million visits are made to EAZA members each year, which enables EAZA members to communicate directly with a broad cross-section of the European community.

EAZA's zoos and aquariums undertake conservation not only via coordinated breeding programmes mandated by the Convention on Biological Diversity and the EU Zoos Directive, but they also operate, fund and partner other organisations in conservation and reintroduction projects in the wild. This is particularly true for vulture populations.

Europe is home to four species of vultures. The Egyptian vulture *Neophron percnopterus* is threatened with extinction, as it is listed as 'Endangered' on the IUCN Red List of Species, while the European black vulture *Aegypius monachus* is currently listed as 'Near Threatened'. The European black vulture as well as the other two species, griffon vulture *Gyps fulvus* and bearded vulture *Gypaetus barbatus*, has recovered from very low populations after decades of conservation efforts by several EU Member States and the European Union. All European vultures are protected under the Birds Directive (2009/147/EC) which requires conserving their populations at secure and viable



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levels. Millions of euros have been spent in recent decades on vulture conservation by both the EU and Member States.

EAZA runs breeding programmes for all four vulture species and the aim of these programmes is to maintain healthy populations in captivity that can be used for a number of conservation activities. These include being ambassador species to inform and educate zoo visitors, facilitating research in areas such as breeding biology, and also acting as a back-up population for the wild. Over the last decades numerous birds of different vulture species have been made available from zoos for reintroduction projects and these birds have contributed to the recovery of vulture populations in Europe. EAZA as a community has invested enormous effort (staff time, money, space) in maintaining these captive populations and has informed millions of its visitors about the conservation actions taken for these four vulture species.

The availability of veterinary diclofenac in the EU threatens to completely undermine all these efforts and also threatens the existence of wild vultures in Europe.

The use of veterinary diclofenac has already been clearly identified as the primary reason for the death of 99% of India's and Pakistan's vultures since the mid-1990s. The use of diclofenac in Europe could have the same consequences on populations of vultures in Spain, Italy and other countries of the EU. Adjusting the labelling of vials of diclofenac will simply not be sufficient to protect vultures, and this has already been demonstrated in south Asia.

Finally, we would stress that there is a safe alternative drug that has been identified – meloxicam. This has been shown to be an effective and non-toxic replacement for diclofenac.

As the effect of diclofenac on vultures has not been at all considered in the risk assessment for the approval of veterinary diclofenac, we would urge you to start a referral procedure for the withdrawal of this drug under article 35 of the Veterinary Medicines Directive (2001/82/EC) and introduce a ban on its production, marketing and use for veterinary purposes in the European Union.

Thank you for considering our request.

Yours sincerely

Dr Lesley Dickie
Executive Director

Cc: Mr. Janez Potočnik - Commissioner for Environment