May 21, 2014

Mr Tonio Borg
EU Commissioner for Health and Consumer Policy
European Commission
B-1049
Brussels
Belgium

Dear Commissioner Borg,

On behalf of the Wildlife Conservation Society, I am writing to strongly support the position of BirdLife Europe (part of BirdLife International) and Vulture Conservation Foundation in asking the European Union to take prompt and decisive action to ban the use of veterinary diclofenac in Europe.

It has been amply demonstrated that the use of veterinary diclofenac on the Indian subcontinent was unintentionally responsible for the catastrophic collapse of several species of vulture. Population declines of several vulture species were greater than 97% as a result of such use, equating to a loss of many millions of pairs. The vultures died from acute kidney failure within two days of eating carcasses of cattle that had been treated with labeled doses of diclofenac. It has been estimated that less than 1% of the carcasses in India needed to contain diclofenac in order to create the vulture population crashes that ensued.

The recent licensing of veterinary diclofenac drugs for livestock farming in Italy and Spain greatly risks similar havoc among Europe’s four vulture species, particularly in Spain where the vast majority of these iconic birds reside. These species, the common European Griffon, the Bearded Vulture, the Endangered Egyptian Vulture, and the Near-Threatened Cinereous Vulture would be at great and unnecessary risk confronting the use of veterinary diclofenac, as they subsist almost entirely on livestock carcasses. The action also undermines EU environmental policies to protect wildlife, in particular the EU Birds Directive (2009/147/EC), which includes these four species within the Annex I list of species that require special conservation measures to ensure their survival and reproduction. Failing to take decisive action now also risks the establishment of a precedent for use in African and Asian countries, which have already suffered great declines of vultures for reasons apart from poisoning.

WCS had direct experience with the catastrophic consequences to vultures on the Indian subcontinent. Dr. Martin Gilbert, one of our field veterinarians, witnessed the extinction of colonies holding up to 1,000 pairs of vultures in Pakistan in just three years. His and others’ research has demonstrated vultures’ sensitivity to the nephrotoxic side effects of diclofenac. Dr. Gilbert was part of the successful campaigns in Pakistan, India, Nepal, and Bangladesh to halt the sale of veterinary diclofenac products.
Safe alternative drugs do exist in place of diclofenac for veterinary use (for example, meloxicam), so there is a clear opportunity to avert another terrible crisis similar to the one on the Indian subcontinent while still providing for the continued health of European livestock.

Banning veterinary diclofenac in Europe is a clear and urgent opportunity for the European Union to take action and avoid repeating a wildlife crisis. We thank you for your attention to this issue of international importance.

Yours sincerely,

[Signature]

cc. Mr Janez Potočnik, EU Commissioner for the Environment
    Mr Alfonso Dastis Quecedo, Ambassador Extraordinary and Plenipotentiary Permanent Representative of Spain