



Commissioner Vytenis Andriukaitis
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Cc: Commissioner Karmenu Vella, Acting Director General for DG SANCO Ladislav Miko

Subject: Veterinary use of diclofenac and risks to vultures and birds of prey
Reference number: 14/118

Brussels and Zurich, 20 November 2014

Dear Commissioner Andriukaitis,

We would like to congratulate you on your new role as Commissioner for Health and Food safety. The coming years will be crucial for protecting Europe's citizens and its environment and we look forward to working with you.

As Commissioner responsible for veterinary medicines, we write you to draw your attention to the veterinary use of the drug diclofenac and its risk for vultures and other birds of prey. As you may know, the EMA's CVMP is currently preparing a scientific opinion on this matter and has recently held a public consultation. Ahead of the publication of the advice, scheduled for mid-December, we would like to highlight our reasons for concern regarding the market authorisations of diclofenac for veterinary use in Spain and Italy and potentially in other EU member states in the future.

The scientific community has warned us that the drug diclofenac is extremely toxic to vultures, as upon ingestion it causes renal failure and death within a few hoursⁱ. 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. Further, only a small proportion of contaminated carcasses are required to cause substantial declines in vulture populationsⁱⁱⁱ. The veterinary use of the drug has been responsible for 96.8-99.9% declines in resident vulture species in India and Nepal within two decades^{iv}. India, Pakistan, Bangladesh and Nepal have since banned diclofenac for veterinary use to curb these declines. Using Spanish government estimates of the number of diclofenac contaminated carcasses available to vultures annually, our scientists have estimated the subsequent number of vulture deaths in Spain may be as high as 4792 individuals per year^v.

As scavengers, vultures play a vital ecological role and a sudden decline in their numbers can have unforeseen consequences. As vultures declined in India, for example, exposed livestock carcasses became available to new and 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, a leading agreement under the UN Environment Programme to which both the EU itself as well as all EU Member States are Parties, has during its last Conference of the Parties (November 2014) adopted Guidelines to Prevent the Risk of Poisoning to Migratory birds. A key recommendation of the guidelines is the ban of the veterinary use of diclofenac as one of the most severe causes of poisoning worldwide.

The EU and the EU Member States have shown a strong commitment to halting biodiversity loss in the European Union. In this respect it is important to highlight that three vulture species in Europe are currently severely threatened: The Egyptian Vulture is threatened with extinction, as it is listed as 'Endangered' on the IUCN Red List of Species. The Cinereous Vulture and the Bearded Vulture are currently listed as 'Near Threatened'. The other species, Griffon Vulture, has recovered from very low populations after decades of conservation efforts by several EU Member States and the EU. Experimental testing has shown the toxicity of diclofenac to Griffon vultures.

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 the conservation of vultures, and there have been at least 67 LIFE projects related to these species – between 2008 and 2012, nine vulture conservation projects alone received 10.7 million Euros.

In the EU Member States supplementary feeding of vultures has, together with nest protection and habitat restoration, been instrumental in the recovery of the vulture populations. This supplementary feeding takes place in accordance with the Animal Byproduct Regulation (EC 142/2011) in strictly controlled feeding stations, as well as in Special Protection Zones designated under the Animal Byproduct Regulation. We are concerned about the effects that diclofenac could have on vultures that feed in the feeding stations or protection zones.

Finally, we would like to highlight here that a safe alternative to diclofenac is available. The drug meloxicam has comparable veterinary properties to diclofenac, but has been tested on vultures and shown to be safe.

We therefore ask you to start 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 for vultures and other bird species. We believe that only a full referral procedure can provide the certainty that is needed to take an informed decision on the authorization of diclofenac for veterinary use.

Sincerely yours,



Mr Ariel Brunner
Head of EU Policy
BirdLife Europe and Central Asia



Dr José Tavares
Director
Vulture Conservation Foundation



Ms Janice Weatherley-Singh
Director of European Policy and Government Relations
Wildlife Conservation Society



Ms Sonja van Tichelen
EU Director
IFAW - International Fund for Animal Welfare

¹ 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.

¹ http://www.ema.europa.eu/docs/en_GB/document_library/Maximum_Residue_Limits_-_Report/2009/11/WC500013751.pdf

¹ Green *et al.* 2004. Diclofenac poisoning as a cause of vulture population declines across the Indian subcontinent. *Journal of Applied Ecology*, 41:793-800.

^{iv} 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

^v Green and Margalida (in review) The potential threat to Eurasian Griffon Vultures *Gyps fulvus* in Spain from veterinary use of the NSAID diclofenac: a critique of a previous assessment.