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

14 July 2014

Dear Commissioner Borg,

On behalf of IUCN, the International Union of Conservation of Nature, we are writing to highlight the licensing in Europe of the non-steroidal anti-inflammatory drug, diclofenac, for veterinary use (to treat domestic livestock for inflammation and pain relief) and its role in the precipitous declines in vulture populations on the Indian subcontinent. We would like to urge you to put your weight behind an EU and global ban on the drug for veterinary uses, as the governments of India, Pakistan and Nepal did in 2006 (with Bangladesh following suit in 2010) and substituted with safe and widely available alternatives.

Veterinary diclofenac is licensed and available in Italy and now more recently in Spain. Of particular concern, Spain holds 95% of the vultures in Europe and the entire global population of the threatened Spanish Imperial Eagle *Aquila adalberti* (as facultative scavenger that could be affected by this medicament). Diclofenac has been clearly demonstrated to cause catastrophic levels of mortality of vultures and other facultative scavengers that consume any livestock that have been treated with the drug, and this has had catastrophic consequence in India (the killing over 40 million vultures in just fifteen years). Africa is home to millions of vultures at severe risk from multiple threats, and there is growing evidence of EU-based companies targeting African markets to sell diclofenac for veterinary uses.

The catastrophic loss of vultures in India has caused major knock-on impacts including increases in feral dog numbers that exploit the vulture food sources (and thereby giving rise to higher incidence of rabies and dog bites) and much increased costs of carcass disposal. Most alarming, is the threat of total extinction of several vulture species and the associated loss of biodiversity and the important ecosystem services that they provide.

Although IUCN is conscious that veterinary regulations are relatively strict in Europe, these are not always failsafe – even a tiny proportion of treated carcasses (Green *et al.* 2004¹) reaching the food supply would have very serious impacts on vulture populations due to the high toxicity of diclofenac to these species. Furthermore, regulations in Spain allow livestock carcasses to be left in situ (abandoned in fields or and/or feeding stations) for wild scavengers (Margalida *et al.* 2012²). Thus the potential exposure of vultures and other carrion-eaters to livestock treated with diclofenac could be extensive across the entire Iberian Peninsula (Margalida *et al.* 2014³).

¹ Green, R. E., Newton, I., Shultz, S., Cunningham, A. A., Gilbert, M., Pain, D. J. and Prakash, V. (2004). Diclofenac poisoning as a cause of vulture population declines across the Indian subcontinent. *J Appl Ecology* 41(5): 793-800.

² Margalida, A., Carrete, M., Sánchez-Zapata, J. A. and Donazar, J. A. (2012). Good news for European vultures. *Science* 335: 284.

³ Margalida, A., Sánchez-Zapata, J.A., Blanco, G., Hiraldo, F., and Donazar, J. A. (2014). Diclofenac Approval as a Threat to Spanish Vultures. *Conservation Biology* 28(3): 631-632.

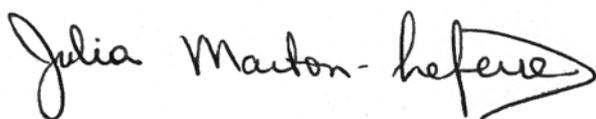
At a technical level, there is a strong role for the European Commission, as it would appear that there have been shortcomings in the implementation of the EU-agreed risk assessment procedures. The Directorate-General for Health and Consumers is well placed to initiate a ban on the drug for veterinary uses using the Veterinary Medicines Directive (2001/82/EC) in order to protect species of European Community interest listed in the Birds Directive. More broadly, we urge the European Commission to call for a worldwide ban on the veterinary uses of diclofenac under guidance provided by the World Organisation for Animal Health (OIE). This would resoundingly reverse the signal to other countries (which has been given by the legalization of use in Italy and Spain) that it is safe to licence veterinary diclofenac for cattle.

We believe that the case for evoking the precautionary principle under Article 191 of the EU treaty is strong in this instance. Asking for a technical opinion from the European Medicines Authority will be useful, but this might miss the wider global risks that are posed by the veterinary use of diclofenac.

Across South Asia, the governments and conservation community have successfully taken steps to ban veterinary diclofenac since 2006, and instead encourage the use of other out-of-patent drugs that are widely available alternatives (such as meloxicam) that are known to be safe for vultures and other scavengers. In conclusion, IUCN respectfully calls on the European Commission to revoke the licensing of this drug for veterinary purposes in Europe and to spearhead a global effort for a worldwide ban on veterinary diclofenac through the OIE (which would include prohibiting EU-based companies from exporting veterinary diclofenac). IUCN would also like to see the mandatory safety-testing of future veterinary products that could be used to treat animals that may become food for avian scavenger species. This should encompass not only safety testing of substances that are currently on the market, but also new substances that may come onto the market now or in the future. The burden of proof can be changed to rest with the applicant or manufacturer to show that a non-steroidal anti-inflammatory drug is safe for vultures and other scavenger raptors through independent safety testing.

IUCN (drawing particularly the expertise contained within the Vulture Specialist Group and the Wildlife Health Specialist Group of our Species Survival Commission) stands ready to support you with any information and advice, both technical and scientific, about the serious threat of veterinary diclofenac. As you are aware, many of the European Union member countries are also State and / or Government Agency Members of IUCN.

Yours sincerely and respectfully,



Julia Marton-Lefèvre
Director General



Simon N. Stuart
Chair, IUCN Species Survival Commission

CC: Mr Janez Potočnik, European Commissioner for the Environment