Mr. Vytenis Andriukaitis  
EU Commissioner for Health and  
Consumer Policy  
European Commission  
B-1049 Brussels  
Belgium

17 November 2014

Dear Commissioner Andriukaitis,

The Society for Conservation Biology (SCB) is an international organization of scientists and conservation professionals (researchers, educators, resource managers, administrators, consultants) dedicated to promoting the scientific study of the phenomena that affect the maintenance, loss, and restoration of biological diversity. The European Section (SCB-ES) represents conservation professionals from all the 27 EU member states and beyond.

On behalf of the Society for Conservation Biology (SCB), we would like urge you to act towards an EU wide and global ban of diclofenac, a non-steroidal anti-inflammatory drug for veterinary use (to treat domestic livestock for inflammation and pain relief).

Diclofenac has been clearly demonstrated to cause catastrophic levels of mortality in vultures and other facultative scavengers that consume carcasses of livestock treated with the drug. This has had catastrophic consequence in India, killing over 40 million vultures in just fifteen years. Africa is also 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.

Within Europe, veterinary diclofenac is licensed and available in Italy and more recently in Spain. This is of particular concern, as Spain holds 95% of the European vultures. Although SCB is conscious that veterinary regulations are relatively strict in Europe, these are not always foolproof – even a tiny proportion of treated carcasses 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 and Portugal allow livestock carcasses to be left in situ (abandoned in fields or and/or feeding stations) for wild scavengers. Thus the potential exposure of vultures and other carrion-eaters to livestock treated with diclofenac could be extensive across the entire Iberian Peninsula, and there is recent evidence pointing to impacts of this drug on eagles as well.

EU member states have the legal obligation to conserve vultures under the EU Birds Directive and EU Veterinary Drugs legislation. However, after decades of efforts and millions of euros invested in vulture conservation in Europe (including captive breeding and re-introduction), the introduction of diclofenac now puts these efforts in jeopardy.
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. 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. SCB urges the European Commission to revoke the licensing of diclofenac for veterinary purposes in Europe.

We thank you for your attention to this issue of international importance.

Yours sincerely,

András Báldi
president
SCB Europe Section