Ref: 14/022

Subject: Referral procedure for Veterinary use of diclofenac

Brussels, 3 March 2014

Dear Ms Testori Coggi,

We write you to alert you that the drug diclofenac has been authorized for veterinary use in Spain and Italy and that urgent action is needed to protect Europe’s vultures from exposure to this dangerous drug.

Diclofenac is extremely toxic to vultures. The veterinary use of the drug has been responsible for a 99% decline of Vultures in the India and Pakistan within a few decades. A single event with a high exposure of the drug can kill a large number of vultures. 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 dangerous. India, Pakistan and Nepal have banned diclofenac for veterinary use.

A safe alternative is available. The drug meloxicam has been tested on vultures and has comparable veterinary properties. Another alternative however, aceclofenac, is unfortunately also very dangerous for vultures, as it is converted to diclofenac in by the body of vultures and cattle. Aceclofenac is not legal for veterinary use in food producing animals, as there have been no maximum residue limits set.

Europe is home to four species of vultures. The Egyptian Vulture is threatened with extinction, as it is listed as ‘Endangered’ on the IUCN Red List of Species, while the Cinereous Vulture is currently listed as ‘Near Threatened’. The other two species, Griffon Vulture and Bearded Vulture, have 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). This means that Member States need to take the necessary measures to maintain their populations at an adequate level.

We believe that the authorization of diclofenac in Spain and Italy for veterinary use is based on a deeply flawed risk assessment. We attach an analysis of the risk assessments by our scientific experts and a
summary of the scientific evidence on the effects of diclofenac on Vultures, as well as evidence on exposure routes for vultures in Europe.

Under Article 35 of Directive 2001/82/EC any Member State can start a procedure for the withdrawal of an authorized veterinary medicinal drug which affects Community interests. Wild bird species are of Community interest, as stated in the preamble of Habitats Directive (92/43/EEC), and thus fall within the scope of this provision. The effect of diclofenac on vultures is thus a sufficient basis to start a referral procedure.

We would therefore urge you to start a Referral procedure for diclofenac for veterinary use, asking for a withdrawal of the authorization of diclofenac for veterinary use based on an incomplete risk assessment, resulting severe risks for the environment, especially vultures. We would also like to alert you to possibility of aceteclofenac being authorized for veterinary use in food-producing animals, and ask you to ensure a proper risk assessment is undertaken.

If you have any questions regarding diclofenac and vultures, please do not hesitate to get in touch.

Sincerely yours,

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