

**National Symposium on Vulture Conservation 2024:  
A Call-to-Action Statement  
(Proposed by Saving Asia's Vultures from Extinction (SAVE))**

In October 2004 the [Bird Conservation Society of Gujarat \(BCSG\)](#) hosted the first national meeting in India where diclofenac was highlighted as the cause of the mass die-off of India's vultures. Despite decades of effort and a national ban on the veterinary use of diclofenac, India's vultures remain at serious risk from toxic Non-Steroidal Anti-Inflammatory Drugs (NSAIDs). In line with obligations already agreed by the Indian Government as Party to the [Convention on the Conservation of Migratory Species \(CMS\)](#)<sup>1</sup> the organisers of the 2024 National Symposium on Vulture Conservation propose all participants and the broader conservation community unify in their support to the following statement:

***The assembled individuals and organisations call upon the Government of India to instigate, and legislate for, testing protocols which ensure that all drugs under consideration for use in livestock be tested to ensure safety for vultures before licences are issued and drugs released onto the market for veterinary use.***

***A new study<sup>2</sup> published earlier this year examined the existing regulatory processes for veterinary drugs in Europe and South Asia and found them to be ineffective at protecting vultures and other wildlife. Such a consistent and precautionary approach is seen as the only way that India's remaining vultures can be free from the threat of toxic NSAIDs.***

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<sup>1</sup> Resolution 12.10 (Rev.COP14) on the [Conservation of African-Eurasian Vultures](#) adopted by the Conference of the Parties at its 14th Meeting (Samarkand, February 2024) **to urgently address: a) the poisoning of vultures, particularly by poison baits, the veterinary use of diclofenac and other non-steroidal anti-inflammatory drugs (NSAIDs) toxic to vultures.**

In conjunction with the CMS Preventing Poisoning Working Group and in line with the Guidelines to Prevent Poisoning of Migratory Birds adopted by Resolution 11.15 (Rev.COP14) [Preventing Poisoning of Migratory Birds](#), ensuring that national conservation legislation is properly implemented and enforced and Resolution 11.15 (Rev.COP14) agrees to:

- a. ensure safety testing of existing veterinary NSAIDs on live, captive Old World vultures, eagles and other scavenger birds;
- b. withdraw licensing of vulture-toxic NSAIDs (including diclofenac) for veterinary use or implement comprehensive risk assessment with particular reference to known regional threats to vultures and other scavenging raptors;
- c. **ensure that safety testing on vultures of new veterinary NSAIDs is made a mandatory part of the protocol of research and development and wholly financed by the pharmaceutical industry, making licensing conditional on the results of these tests; and**
- d. contribute to identification and promotion of safe alternative drugs

<sup>2</sup> Current policies in Europe and South Asia do not prevent veterinary use of drugs toxic to vultures - Cook - 2024 - Ecological Solutions and Evidence - Wiley Online Library

## Background

Before the widespread veterinary use of diclofenac in cattle became common place in the 1990s, India had populations of White-rumped, Indian and Slender-billed Vultures in their millions which provided valuable eco-system services by rapidly removing cattle carcasses from the environment. The introduction of diclofenac led to the well documented decimation of these populations by up to 99.9% and now only remnant wild populations of these Critically Endangered birds survive.

[A newly released paper](#)<sup>3</sup> 'The Social Costs of Keystone Species Collapse: Evidence from The Decline of Vultures in India' has estimated that the loss of vultures in South Asia caused **500,000 additional human deaths between 2000 and 2005 and an economic cost of nearly \$70 billion per year.**

Without vultures, cattle carcasses were left lying for long periods hence: a) incubating a host of potentially deadly bacteria and so acting as reservoirs of disease and b) leading to an increase in other scavengers such as rats and dogs, which as well as being less efficient at cleaning up the environment, cause other public health problems such as rabies. For example, **feral dog numbers** have increased dramatically in India to as many as **62 million**<sup>4</sup>, and according to government figures **4.7 million anti-rabies vaccines were administered in India in 2023** alone following animal bites.

The banning of diclofenac for veterinary use in 2006 should have ended this dark chapter in the history of India's vultures, however these vitally important birds remain at risk from NSAID formulations that continue to be released by pharmaceutical companies and used by cattle owners. It is entirely feasible that a new drug used at scale and combined with the many other threats facing vultures in a modernising India could complete the eradication of vultures from the continent.

Independent testing undertaken by the Indian Veterinary Research Institute (IVRI) in collaboration with the Bombay Natural History Society (BNHS) has shown that drugs such as **aceclofenac, ketoprofen and nimesulide** are toxic to vultures and this evidence proved essential in getting bans issued in 2023 for both aceclofenac and ketoprofen following a case at Delhi's High court. Nimesulide however remains legally available despite a recent recommendation by the Drugs Technical Advisory Board of India, and there are further drugs (notably **flunixin**) that have not yet been fully tested on vultures despite the evidence very strongly suggesting high toxicity to vultures, similar to diclofenac.

Since the diclofenac crisis of the 1990s and early 2000s, several bold and decisive actions have been taken by the Government of India following expert scientific and legal advice to ban drugs, alongside the establishment and continued funding of pioneering captive breeding centres. These actions have been instrumental in averting the national extinction of the vultures thus far and show that effective measures can and have been taken.

However, ad-hoc vulture safety testing by conservation NGOs and the banning of toxic formulations of drugs only after they have been released to market is cumbersome, costly, time consuming and fraught with risk both for vultures and for companies investing in the production and marketing of new veterinary drugs.

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<sup>3</sup> The Social Costs of Keystone Species Collapse: Evidence from The Decline of Vultures in India – Frank & Sudarshan – 2023

<sup>4</sup> [The State of Pet Homelessness Index](#)



The obvious solution is to ensure all veterinary drugs are tested for vulture toxicity before they can be licensed and released onto the market – a conclusion supported by a [new study](#)<sup>5</sup> published in 2024 which examined the existing regulatory processes for veterinary drugs in Europe and South Asia and found them to be ineffective at protecting vultures and other wildlife.

**To prevent any form of repetition of the disaster of diclofenac from ever occurring again, the Government of India must implement all recent international commitments made under the CMS, and especially to instigate and legislate for testing protocols which ensure that all drugs under consideration for use in livestock be tested to ensure safety for vultures and other endangered animals before licenses can be issued and drugs released onto the market for veterinary use.**

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<sup>5</sup> Current policies in Europe and South Asia do not prevent veterinary use of drugs toxic to vultures - Cook - 2024 - Ecological Solutions and Evidence - Wiley Online Library

# Gujarat Outcome Call to Action Document: -

## Revival of viable population of vultures in the wild depends upon:

### 1. Banning of Harmful Drugs

- a. Those NSAIDS already identified as vulture-toxic must be banned with immediate effect by the Gujarat Drug Controller and the Drug Controller General of India. This includes Nimesulide already recommended for a ban by Drugs Technical Advisory Board (DTAB).
- b. Drug regulation must be based on safety testing on vultures before they are licensed for veterinary use.
- c. Promoting, existing vulture-safe drugs (meloxicam, tolfenamic acid) by ensuring their availability and distributing them at subsidized rates.
- d. Identifying and promoting additional vulture-safe drugs.
- e. The Convention on Migratory Species (CMS) has included all the above-mentioned suggestions on drug regulation in its resolution 11.5. We must find appropriate pathways and mechanisms to lobby the Government of India and push through its earliest implementation.

### 2. State-level Actions

**Aim: An integrated Approach is needed involving advocacy, education, monitoring, research, conservation breeding, supplementary feeding, and site protection.**

- a. **Ensuring total withdrawal of vulture toxic NSAIDS from veterinary practices.**
  - i. Dispensation of the banned drugs by chemists must strictly be checked and monitored.
  - ii. Sale of veterinary NSAID formulations must be on prescription only
  - iii. Review, introduce, and enforce strict penalties for illegal sales of banned drugs. Vigilance must be uncompromising, and offenses publicised.
  - iv. Declaring toxic NSAIDs (including diclofenac)-free areas district by district.
- b. **Feeding sites within the foraging range of known vulture population groups must be monitored for a safe environment and safe uncontaminated food.**
  - i. Scientific management of dumping sites with proper carcass disposal practices must be ensured
  - ii. A safe environment without a serious dog menace must be created

- iii. Creating special vulture-safe feeding sites, involving communities and other agencies may be thought of. These sites could be promoted as sustainable eco-tourism conservation sites.
  - iv. Misuse of toxic drugs must be cross-checked through undercover pharmacy surveys and by regular sampling of liver and kidney from cattle carcasses for chemical assays.
- c. Awareness and Education**
- i. Public Campaigns: Raising awareness regarding the importance of vultures as scavenging birds and the threats they are facing can foster public support in conservation efforts.
  - ii. Sensitizing chemists and veterinarians about the gravity of the situation and advocate a total boycott of these drugs
  - iii. Awareness amongst cattle owners and cattle-shelter owners. They must ensure that traditional dumping sites offer safe food.
- d. Scientific Research:** Initiating and supporting scientific research on vulture ecology, health, and behaviour.
- i. **Upscaling satellite tagging and monitoring:** A sample of wild birds from each existing vulture population unit must be tagged and tracked to assess their survival, safety of food sources, range of movements, security of nesting sites, and so on. Tagging will also help monitor rescued and released birds as well as any future releases of captive-bred birds.
  - ii. **Establishment of Vulture Safe Zones (VSZ)** Large areas as per the existing guidelines for VSZ must be charted out. They should encompass the mean foraging range of the known vulture communities. VSZ will be 100% free of banned vulture toxic drugs. The known vulture habitats and nesting sites within VSZs will remain protected. VSZs will allow us to safely tag wild birds for research and monitoring purposes. It will also provide as a secured area to release tagged captive-bred individuals.
  - iii. **Research and monitoring** regular vulture population estimation surveys to assess the response to our ongoing conservation efforts
  - iv. **Reporting system on vulture deaths** must be developed with written recording and data-storage protocols and pathways for immediate transportation and reliable tissue analysis.
- e. Conservation Breeding Program:** It is very vital to build up the safety-net population of local breeding birds. A conservation breeding programme is an insurance against continuing decline. We must either upgrade the existing vulture conservation breeding center at Sakkarbaug Zoo, in Junagadh, or raise a new center under the guidance and surveillance of experienced and accomplished vulture conservation breeding biologists. It is very essential to collaborate with a National Organization having vast experience in this field

### 3. Delivery of state-level action plan apparatus

- a. A state committee must be formed which includes PCCF, State Drug Controller, Director of Animal Husbandry, Representatives from NGOs, Representatives from cattle-shelter, drug manufacturers, cattle owners, chemist associations, veterinary practitioners, vulture experts, volunteers, etc.
- b. A local action plan may be framed in line with the framework of the national action plan.
- c. Conservation agreements by IUCN, CBD, and CMS must be kept in mind while designing the Action Plan. Priority actions suggested by the SAVE consortium must be considered while defining the strategy.
- d. It is critical to foster good relations with decision-makers.
- e. Association with National and International lobbyists and cooperation with all the stakeholder groups must be ensured.
- f. It's a shared responsibility of different line departments, civil society, and private sectors.
- g. A Nodal agency must be identified GFD seems to rightfully qualify for that position considering the committee is about schedule 1 species.
- h. A District-level committee may be created at least for districts holding breeding populations of vultures.
- i. Fixing responsibilities delineating action and defining timelines are very important next steps.
- j. Annual state-level meeting can review ongoing vulture conservation efforts and must be held. Existing and emerging conservation challenges and course correction is done.
- k. Capacity building of the working group with the support from GFD and National and International Wildlife Conservation institutions is essential.



The following organisations and individual experts attended and contributed to the Symposium, and endorsed these recommendations:

BCSG

WWF India

BNHS

Wildlife Institute of India

SACON

IVRI

SAVE

State of India's Birds

Arulagam

Hume Centre for Ecology and Wildlife Biology Institute

Dr. Vibhu Prakash – Senior Vulture Conservationist

Dr. Percy Avari – Vice President -The Eye Vet and The Cancer Vet

Dantiwada Veterinary College

Dr. Devojit Das – Senior Veterinarian - Vets for Vultures and Himalaya Wellnesss Company India

Karnataka Forest Department (Dr. Prayag H S)

Royal Society for the Protection of Birds

CMS Raptors MOU

Gaurav Bansal – Lawyer with Delhi High Court

Bird Conservation Nepal

Zoology Department, Gujarat University

Sustainable Ecology Foundation

Jivdaya Charitable Trust