

SHEEP DIP POLLUTION REDUCTION PROGRAMME

STEERING GROUP MEETING 04 December 2006 Bristol

ACTIONS

General

- EA to send the following presentations and revised guidance to the group.
 1. Defra Groundwater Protection Code (use & disposal of sheep dip).
 2. Veterinary Medicines Regulations 2006 (SI 2407).
 3. NPTC revised Certificate of Competence in the safe use of sheep dips.
 4. Presentation from EA on updates under Part 1 of PRP.
 5. Presentation from NFU on stop every drop campaign.
 6. Presentation from Enco on the raw wool database.
 7. Presentation by GHK on options appraisal study.
- EA to send the names and details of peer reviewers who are to look at the CSL studies.
- EA to propose date and venue for next steering group meeting.

Raising Awareness

- Industry groups to consider how best to progress action 1.6 of PRP and report to Spence.

- Group to consider how we measure success of the various actions under raising awareness section of PRP.
- Defra to consider placing PRP on their web pages.
- NOAH via Stephen Dawson to ask manufacturers if they can provide some monies for further stop every drop print run.

Monitoring

- EA to provide full interpretation to the group of monitoring results at next meeting.

Options Appraisal

- Any further suggestions for sub options to be forwarded to Spence ASAP.
- All available information/data/studies/representations to be made to Spence by week 18 December 2006.

Updates of PRP

Raising awareness and best practice

- 1.1(a) Alastair Johnston NFU. 10,000 “stop every drop” leaflets have been printed. 9250 have been distributed to industry, farm merchants & EA. Require additional funding for print run & distribution of a further 40,000 plus leaflets ahead of spring 2007. In discussions with Livestock Auctioneers Association (LAA) and British Wool Marketing Board (BWMB) regarding a possible distribution route if funding secured. Group asked for ideas to help fund further print runs.
- Hugh Thomas NFU Cymru confirmed that initial welsh print run of leaflet had been completed.
- Craig Campbell NFUS reported Scotland not going down same route due to possible General Binding Rules as a result of the Water Framework Directive.
- Salmon and Trout Association (STA) still felt action was inadequate.

- 1.1(b) The Veterinary Products Committee (VPC) agreed at their September meeting to review the use of showers & jetters. VMD are awaiting that advice from the VPC.

- 1.1(c) HSE have redrafted dipping leaflet but awaiting developments on cypermethrin before committing to print. Have advised inspectors as to revised Certificate of Competence (CoC) requirements for “dippers” as can enforce under their own legislation.
- 1.2 VMD have committed to undertaking a thorough review of labelling on sheep dip products once all the information (options appraisal, Central Science Laboratory (CSL) studies & manufacturers answers are available).
- 1.3 The Defra Code of practice on the Protection of Groundwater (use & disposal of dip) has been reviewed in 2006 although only minor modifications were made. Messages on showers & jetties, disposal and siting of dips were all strengthened.
- 1.4 Animal Health Distributors Association (AHDA) have distributed some 1750 stop every drop leaflets to suitably qualified persons (SQPs) at farm merchants during September 2006. Animal Medicines Training Regulatory Authority (AMTRA) are also progressing training to role out the new requirements of the CoC as SQP’s have to undergo CPD, the next event is scheduled for 24 January 2007 in Blackpool.
- 1.5 Both the Veterinary Medicine Regulations and the CoC for purchase & use of sheep dip have been revised in 2006 by VMD & National Proficiency Test Council (NPTC) respectively. All users of dips must hold a CoC from 1 April 2007 unless deemed “experienced” in which case by 31 December 2008.
- 1.6 No progress to report on the wider use of Agricultural schemes and payment structures to encourage best practice regarding sheep dip. The group were invited to suggest ways of getting these tools amended or updated to incorporate such messages. See actions.

Steering group was requested to consider how we should start to measure the success of the various actions under the raising awareness section of the PRP.

Spence Seaman then presented an update on pollution incidents recorded by the EA.

2004 saw 24 “serious” incidents

2005 saw 19 “serious” incidents

2006 to date has seen 4 such incidents; details were provided.

Discussion took place as to why the drop in 2006 to date, various factors were discussed including: weather, suspension of cypermethrin, better awareness.

STA felt EQS data was a better indicator. EA clarified that various indicators are used and EQS and pollution incidents were just 2 such measures. EQS data however lags behind by at least 12 months due to an annual assessment being required.

Meeting noted that the PRP does not appear on the Defra web site. Defra, via SCOPS group, requested to investigate and see if it can be placed on their own web pages or failing that a link to others (EA or VMD).

Monitoring Update

Spence provided an update as to what monitoring had & was taking place following an exercise to role out investigative monitoring in Wales to other sheep farming Regions, using targeted, risk based principles. Monitoring to be a mixture of chemical including water (spot samples & passive sampling devices), moss & sediments as well as biological survey work where ever possible. Details of the programme have been recently circulated to the group by e-mail and results will be presented at the next steering group meeting.

Jennifer Best (natural England) raise some issues regarding the biological techniques and scoring systems used which it was agreed to discuss outside of the meeting.

The meeting noted that results will need full interpretation to be provided at the same time.

Discussion as to whether targeted approach was accurate enough. Peter Morris, National Sheep Association (NSA) pointed out that as parasitic burdens were so variable along with the weather year on year that it is impossible to be any more accurate other than to follow current proposals aimed at targeting highest sheep densities.

Raw Wool Database

Mike Madden of Enco provided an insight into the information held on the Raw wool database which holds information on raw wool from some 50 countries from 1996 to date. Some 50 samples are analysed from a variety of wool sources each year for 26 different pesticides (year 2000 results are skewed by 2 very contaminated samples). Although permethrin & propetamphos found

occasionally the predominant pesticides were diazinon & cypermethrin. The graphs of average raw wool concentrations were presented and Mike explained that concentrations ranged from zero or trace through to some very high concentrations and that cypermethrin concentrations of between 5-10mg/kg will start to cause compliance problems for the wool scourers and their resultant discharge to sewer.

Sampling costs are approximately £200 per sample.

Science Update

Nick Renn VMD explained that the 2 Central Science Laboratory (CSL) studies were in the penultimate stages of reporting and they would both now be subject to peer review over Christmas. The 3 possible outcomes were explained:

- excellent science and publish as final report.
- needs some alterations ahead of publishing
- not based on good science and therefore shouldn't publish.

He hoped that the final reports would be produced by end February.

Guy Linley-Adams Anglers Conservation Association (ACA) requested names of Peer reviewers, EA agreed to provide to group. STA were not happy that the process had apparently been altered from that agreed at the last meeting without any notice. Chair stressed that the manner & process of doing/reporting the work was as important as the results themselves and it would not be sensible for VMD to circulate results / findings to the steering group that may then be subject to further iteration as a result of the peer review.

STA, ACA & Buglife wished their dissatisfaction with the change in process noted.

Jennifer Best requested to be informed by e-mail as soon as reports were available.

Wales & Scotland Perspectives

Mary Bradley SEERAD explained that they had obtained agreement from Ministers to introduce legislation to help implement the Scottish sheep scab initiative. This would involve compulsory treatment periods. A stakeholders meeting is due to take place soon. Goal is better control rather than total eradication. NSA agreed with the goal. Defra support the approach where it can but are concerned as to any programme of treatment that may increase resistance issues. Their preferred route is prevention by better diagnosis.

Joanne Glen WAG explained that Wales are concentrating on raising the awareness by Stop every Drop and catchment sensitive farming initiatives. Have projects underway with the Institute Of Grassland & Environmental Research (IGER) and British Veterinary Association (BVA) looking at worm issues. Baseline survey for scab initiative is being consulted on. Many local authorities are requesting more powers to take action themselves.

Post meeting note: Stephen Jess NI DARD reported by e-mail that he is currently working on a pesticide usage survey with the sheep sector in Northern Ireland and should be able to report in early 2007.

Options appraisal study

James Medhurst of GHK presented an update on the options appraisal study. The key issues and points raised by the group are detailed below.

Specifying the problem & setting the policy context

- NSA requested benefits of sheep dipping be recognised.
- NFUS stressed that options cant just be about the most cost effective solution.
- Additional policy context & objectives are needed such as EA duties and devolved Gov't duties.
- Affected parties needs expanding to include regulators & sheep industry.
- NSA: must consider profitability as well as cost per sheep of treatment.
- ACA: value of fishing needs to reflect much greater value of fly or game fishing.
- STA: impact of failing EQS downstream of STW's needs assessing.
- Buglife: under appraisal criteria, impact on terrestrial ecosystems needs considering.
- EA: possible costs of infraction proceedings for failings under the WFD need to be considered.
- NSA: Organic farming methods/restrictions need to be accounted for.

The group were encouraged to submit any further policy areas that need to be considered.

Comparison of the options

GHK stated: all arguments will have to be defended by the interest group involved especially where the measure is qualitative and based on as much evidence as possible.

The meeting agreed the following definition of option 4 (do nothing); “where we are today but with the ban on cypermethrin lifted ie; education & raising awareness going on, new CoC in place & revised guidance available where applicable.”

The option of a total ban on dipping will be considered as a sub option under option 1: permanent withdrawal of cypermethrin. If however any option falls below a de minimus level of current levels of welfare or environmental standards it will not be considered in further detail by GHK.

Any further suggestions for sub options to be forwarded to Spence ASAP.

ACA raised the possibility of the study needing more time to consider the options.

Chair suggested we should push on with the study to current timetable and any reconsideration based on its draft findings should be discussed next time and only if glaring gaps exist in the data should we consider delaying the study.

GHK then presented the initial matrix for appraisal criteria for the policy options considered to date along with some critical issues.

The group raised the following points:

- NFUS asked how do we account for farmers following best practice or not. Do we assess all options on the basis that the minimum standards that need to be achieved are on the assumption that best practice is being followed? As poor practice at dipping with SP's may cause more environmental damage than poor practice with OP's. Group felt we could proceed on the basis of a given % of farmers will be following best practice at any one time.
- NOAH commented that group must agree most appropriate method for measuring & monitoring sheep dip usage.
- Rob Morris NAAC stated health effects of SP's worse than OP's in his experience.
- Chris Kilner Defra stated that ML's provide no residual effect/treatment.

Next Steps

The main appraisal criteria “matrix” in the form of a draft report will be completed by the end of January 2007, this will then be circulated to the Group by e-mail. The Group will have 3 weeks for comment on the information contained within it and the matrix itself. The final draft report will be sent for peer review at the end of February/early March. Following this review the final report will be circulated to the Group ahead of the next Steering Group meeting.

The next Steering Group meeting, now planned for mid April will be used to see what level of agreement the Group can reach over the outcome of the report and in particular the options appraisal matrix.

The Chair stressed that the output of the study will only be as good as the information & data it receives from the Steering Group and he urged the Group to submit what information/data/reports and representations they had within the next 2 weeks to Spence.

STA stated they felt it was too little time to consider and was likely to have too many gaps and stated that the licensing of cypermethrin was a decision for VMD to make and questioned how we could influence that process.

The Chair confirmed that the options appraisal study along with the CSL studies and the manufacturers answers were key pieces of information for VMD to consider when making such a decision. NSA felt a longer timeframe may not deliver anything further.

The Chair felt it was imperative to press on with the current time scale and not introduce further delays to the project. The contractors may identify important information gaps and that they may need to be filled to allow a clear solution to be identified, but this could be addressed within the report’s recommendations, and then subsequently considered by the Steering Group.

ACA felt the lack of data from the ERA (environmental risk assessments) would hinder the study. The Chair encouraged ACA to approach manufacturers to release the ERA information.

Chris Kilner of Defra felt that the study might struggle to assess the potential long term gains against the short term costs.

Matt Shardlow of Buglife felt the information or answers to VMD questions that the manufacturers hold was a further key area of data.

The chair noted the concerns but added that if the Group was not able to agree a position in April, the Group would need to decide what to do next including reviewing the future of the Group itself.

The meeting closed at 15:45.

Attendees – see [Annex 1](#)

Steering group meetings to date 30 September 2005 (Link to document already on website)
21 August 2006 (Link to #180596)
04 December 2006

Agenda - see [Annex 2](#)

Date of next meeting - 17th April 2007 same venue (British Empire & Commonwealth Museum Bristol).

Annex 1

Sheep Dip Steering Group – 4 December, Bristol	Attended
Chair	Philip Rees
Farmers and Farming Unions	
National Farmers Union (NFU)	Alastair Johnston
National Farmers Union Scotland (NFUS)	Craig Campbell
National Farmers Union Cymru	Huw Rhys Thomas
National Sheep Association (NSA)	Peter Morris
Farmer's Union Wales (FUW)	Rhian Nowell-Philips

Contractors	
National Association of Agricultural Contractors (NAAC)	Rob Morris
Manufacturers of Dip	
National Office of Animal Health (NOAH)	Stephen Dawson
Animal Health Experts	
British Veterinary Association (BVA)	Rose Gregono-Thomas
Angling, Conservation and Wildlife groups	
Buglife	Matt Shardlow
Wildlife Trust of South & West Wales	Dyfrig Jones
Salmon & Trout Association (STA)	Carmel Jorgensen
Anglers' Conservation Association (ACA)	Guy Linley-Adams
Government / Regulators	
Environment Agency (EA)	Derek Tinsley Jo Kennedy Bob Merriman Spence Seaman Ian Johnson
Veterinary Medicines Directorate (VMD)	Nick Renn Paula Huckle
Scottish Environment Protection Agency (SEPA)	Darrell Cothers
English Nature (EN)	Jennifer Best
Welsh Assembly Government (WAG)	Joanne Glenn
Scottish Executive Environment and Rural Affairs Department (SEERAD)	Mary Bradley

<u>Apologies</u>	
Environment and Heritage Service for Northern Ireland (EHS)	Dr Adrain Gregory
Confederation of British Wool Textiles	Dr Michael Madden
Department of Agricultural and Rural Development (DARD), Northern Ireland	Stephen Jess
The Country Land and Business Association (CLA)	Ben Underwood
Sustainable Control of Parasites in Sheep (SCOPS)	Brian Hosie (BVA)

Annex 2

Agenda

Meeting on: Meeting of the Sheep Dip Pollution Reduction Programme Steering Group

Date: Monday 4th December, 2006

Time: 11:00am – 3:30pm

Location: The British Empire & Commonwealth Museum, Clock Tower Yard, Temple Meads Bristol BS1 6QH.

Agenda

Teas coffees 10.30-11:00

1. Introductions & matters arising from the first meeting 21 August 2006 (Philip Rees, 11.00am)

11:10 Update on actions 1, 3 & 4 within PRP.

2. Raising awareness. Update (Alastair Johnston & Spence Seaman)
Monitoring update. (Spence Seaman & Mike Madden EnCo)
Science update. Preliminary findings of CSL studies (Nick Renn VMD)

Lunch (12.30 – 1. 00pm)

3. Wales and Scotland perspectives. Updates (Mary Bradley SEERAD & Joanne Glen WAG)

13:30 Update on action 2 of PRP.

4. Options appraisal study. Methodology & progress to date report from GHK Ltd.

5. Date of next meeting - end March 2007.

Close 3:30pm latest